



Report

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Client: Roche Parish Council

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Roche Parish Council Neighbourhood Plan Habitat Regulations Assessment

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1 Introduction

1.1 Background to the Project

- 1.1.1 AECOM was appointed by Roche Parish Council to assist in undertaking a Habitats Regulations Assessment (HRA) of the Roche Neighbourhood Plan Draft Report (November 2015). The objective of the assessment was to:
- identify any aspects of the Neighbourhood Plan that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites), either in isolation or in combination with other plans and projects; and,
 - to advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.
- 1.1.2 Specifically, in correspondence over the Neighbourhood Plan in January 2016, Natural England had commented on the need for an HRA of the Neighbourhood Plan because of reference in the plan to proposals for an A30 to St Austell link road and the diversion regarding potential development of Site D and associated potential for impacts on Breney Common and Goss & Tregoss Moors SAC. Natural England also requested an HRA due to the close proximity to the River Camel SAC of the business park extension in Policy C1.
- 1.1.3 Neighbourhood Plans are required to be in conformity with the relevant Local Plan; in this case both the adopted Local Plan and the new Local Plan which Cornwall have been preparing. Cornwall's new Local Plan is not yet adopted but is in an advanced stage of development having been subject to the first stages of Examination in Public. AECOM (formerly URS) undertook HRA of Cornwall's Proposed Submission Local Plan in 2014¹. Cornwall Council is currently consulting on a Proposed Schedule of Further Significant Changes. The HRA of those Further Significant Changes has also been undertaken by AECOM and is shortly to be issued for consultation². Many issues in Cornwall relate to development across the county and are fully considered in the HRA of the Local Plan. The Local Plan also includes a series of policies facilitating strategic borough-wide protection of internationally important wildlife sites. The HRA of the Neighbourhood Plan has been undertaken with this fact and overarching policies as a key consideration.
- 1.1.4 It must be noted that Neighbourhood Plans do not determine housing numbers for their areas. This is determined strategically in the relevant Local Plan. In addition, Neighbourhood Planning authorities have no authority to consent or refuse transport or highways schemes that fall within the remit of the local highways authority or Highways England. They can only express their support (or otherwise) for such schemes and set out their opinions in their Neighbourhood Plan. These opinions would constitute a material consideration in the planning process but the inclusion of a highways scheme in a Neighbourhood Plan is essentially on a 'for information' basis since the making of the plan could not in itself result in delivery of the road scheme. They do not therefore constitute free standing policy.

¹ URS (2014). Cornwall Local Plan Habitats Regulations Assessment.

² AECOM (2016). Habitats Regulations Assessment of Proposed Schedule of Further Significant Changes to the Cornwall Local Plan Strategic Policies Proposed Submission Document

1.2 Legislation

- 1.2.1 The need for Habitats Regulations Assessment is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats and Species Regulations 2010. The ultimate aim of the Directive is to “*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*” (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status.
- 1.2.2 The Habitats Directive applies the precautionary principle to European sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects with predicted adverse impacts on European sites may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.
- 1.2.3 In order to ascertain whether or not site integrity will be affected, a Habitats Regulations Assessment should be undertaken of the plan or project in question:

Box 1: The legislative basis for Appropriate Assessment

Habitats Directive 1992

Article 6 (3) 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.”

Conservation of Habitats and Species Regulations 2010 (as amended)

The Regulations state that:

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.

- 1.2.4 Over the years the phrase ‘Habitats Regulations Assessment’ has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an ‘appropriate assessment’. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

1.3 Scope of the Project

- 1.3.1 As part of the preparation process for the Neighbourhood Plan, Natural England was consulted. Following consultation Natural England flagged concerns regarding the Neighbourhood Plan. It is these concerns that will be the subject of this document.
- 1.3.2 There are three European designated sites that lie within Roche Neighbourhood Plan Area (Brenay Common and Goss & Tregoss Moors SAC, the River Camel SAC, and a parcel of St Austell Clay Pits SAC) (**Appendix A, Figure A1**), Natural England identified that the Neighbourhood Plan has potential to link to the following European designated sites:
- Brenay Common and Goss & Tregoss Moors SAC; and,
 - River Camel SAC.

1.3.3 As such, it is these two European designated sites that are discussed further within this document. In correspondence, Natural England³ identified that in their view it is necessary to consider the likely significant effects of the following Neighbourhood Plan Policies on the European designated sites identified above:

- Policy B1: (Link Road west of Roche)
- Policy B2: (Potential development of Site D)
- Policy C1: (Employment and development)

1.3.4 This HRA report therefore specifically seeks to consider the potential impacts of these three policies on Breney Common and Goss & Tregoss Moors SAC and the River Camel SAC. Where appropriate, it also recommends safeguarding wording for inclusion within the Neighbourhood Plan which would result in the potential for likely significant effects being investigated further at the planning application stage and ensure that the requirements of the Conservation of Habitats & Species Regulations 2010 (as amended) were applied.

1.4 This Report

1.4.1 **Chapter 2** of this report explains the process by which the HRA has been carried out. **Chapter 3** explores the relevant pathways of impact relating to the policies that have been identified to contain potential impact pathways linking to European designated sites and effectively undertakes screening assessment. This chapter also includes recommendations to Policy text to ensure no likely significant effects result as a consequence of the Roche Neighbourhood Plan. **Chapter 4** undertakes in combination screening of the Neighbourhood Plan in combination with other projects or plans. The key findings are summarised in **Chapter 5: Conclusions**. The interest features and ecological condition of Breney Common and Goss & Tregoss Moors SAC, and River Camel SAC and the environmental processes essential to maintain site integrity are outlined in **Appendix B**.

1.4.2 This following document does not contain full detail of impact pathways identified to have potential to link the Neighbourhood Plan to a European designed site. Full details of impact pathways can be found within the higher tier Plan level HRA documents such as: the HRA of Cornwall's Proposed Submission Local Plan in 2014⁴, and HRA for the Proposed Schedule of Further Significant Changes to the Cornwall Local Plan Strategic Policies Proposed Submission Document in 2016⁵.

1.5 Consultation

1.5.1 Natural England has been provided with a copy of this report and a meeting was held to discuss it between AECOM, Natural England and representatives of Roche Parish Council and Cornwall Council on 4th March 2016.

³ Email to the Parish Council dated 28 January 2016

⁴ Ibid

⁵ Ibid

2 Methodology

2.1 Introduction

- 2.1.1 The HRA of notable policies has been carried out in the continuing absence of formal central Government guidance, although general EC guidance on HRA does exist⁶. The former Department for Communities and Local Government released a consultation paper on the Appropriate Assessment of Plans in 2006⁷. As yet, no further formal guidance has emerged. However, Natural England has produced its own internal guidance⁸ as has the RSPB⁹. Both of these have been referred to alongside the guidance outlined in **section 1.2** in undertaking this HRA.
- 2.1.2 **Figure 1** below outlines the stages of HRA according to current draft CLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.

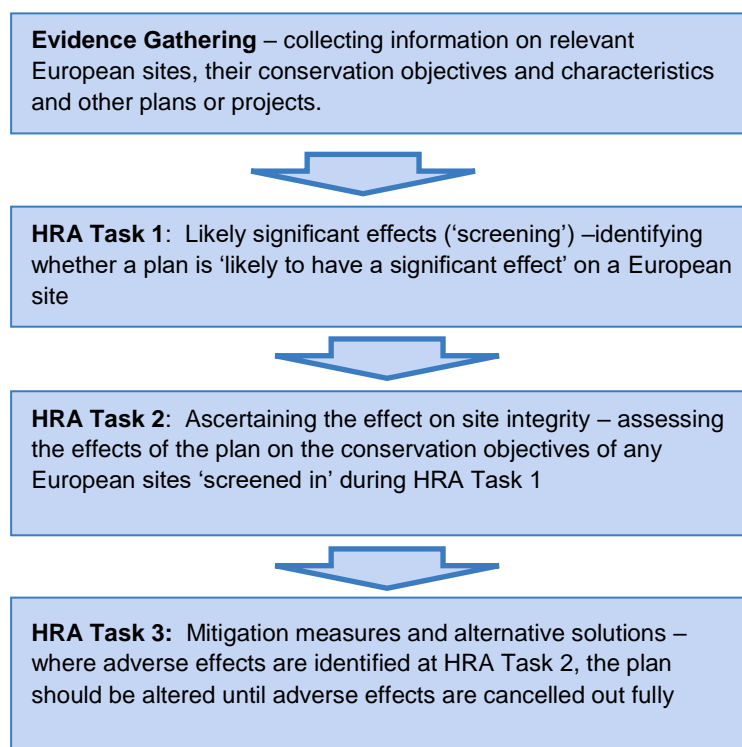


Figure 1: - Four-Stage Approach to Habitats Regulations Assessment

Source: CLG¹⁰, 2006

⁶ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁷ CLG (2006) Planning for the Protection of European Sites, Consultation Paper

⁸ http://www.ukmpas.org/pdf/practical_guidance/HRGN1.pdf

⁹ Dodd A.M., Cleary B.E., Dawkins J.S., Byron H.J., Palframan L.J. and Williams G.M. (2007) *The Appropriate Assessment of Spatial Plans in England: a guide to why, when and how to do it*. The RSPB, Sandy.

¹⁰ Now Department of Communities and Local Government

2.2 HRA Task 1 - Likely Significant Effects (LSE)

2.2.1 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

2.2.2 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites. Essentially this stage has been conducted by Natural England in correspondence¹¹, as detailed in **Section 1.3**.

2.2.3 In evaluating significance, AECOM have relied on our professional judgement as well as the results of previous stakeholder consultation for higher tier Plans such as Cornwall's Proposed Submission Local Plan in 2014¹², regarding development impacts on the European sites listed in **Paragraph 1.3.2** and **Appendix B**.

2.2.4 The draft CLG guidance¹³ makes it clear that when implementing HRA of land-use plans, the HRA should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself: *"The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project."* More recently, the Court of Appeal¹⁴ ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be 'achieved in practice' to satisfied that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Core Strategy)¹⁵. In that case the High Court ruled that for 'a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations'.

2.3 Other Plans and Projects That May Act In Combination

2.3.1 It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European site(s) in question.

2.3.2 It is neither practical nor necessary to assess the 'in combination' effects of the Neighbourhood Plan within the context of all other plans and projects within Cornwall. For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects with potential for in combination likely significant effects are those schemes that have the following impact pathways: air quality and hydrological flows.

2.3.3 The following plans have been assessed for their in combination impact to interact with the Roche Neighbourhood Plan:

- Cornwall's emerging Local Plan and associated amendments.
- Cornwall's Local Transport Plan 3. Connecting Cornwall: 2030 Strategy

2.3.4 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis, but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution

¹¹ Ibid

¹² Ibid

¹³ CLG (Now DCLG) (2006) Planning for the Protection of European Sites, Consultation Paper

¹⁴ No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

¹⁵ High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee¹⁶ case.

¹⁶ **Waddenzee** case (Case C-127/02, [2004] ECR-I 7405)

3 Screening and Likely Significant Effects of the Roche Neighbourhood Plan

3.1 Introduction

3.1.1 As previously noted, it is the following Policies within the Neighbourhood Plan that have been identified to potentially link to European designated sites:

- Policy B1: (Link Road west of Roche);
- Policy B2: (Potential development of Site D); and
- Policy C1: (Employment and development).

3.2 Policy B1: (Link Road west of Roche)

Table 1: Policy wording of Neighbourhood Plan Policy B1: (Link Road west of Roche)

Policy Text
<p>This plan supports the principle of an A30-St. Austell link road west of Roche as a priority, to relieve traffic issues impacting Higher Trezaise, Trezaise, the village of Roche, and Victoria Road.</p> <p>The promotion of this scheme will be a material consideration in the determination of any application along the likely route.</p> <p>Support for this route is subject to the following conditions:</p> <p>a) The new road scheme seeks to include an HGV diversion banning HGV movements through Roche village from the Combellack turning off Trezaise Road to the south of Roche Village, and from the Victoria Rail bridge north of Roche, and into the village from Harmony Road east of the new road, and into Edgumbe Road south of the new road. HGVs to be directed instead onto the new link road (Fig 2.3).</p> <p>b) That measures designed appropriately to the historic context would be taken as part of the new road scheme to improve the central areas of Roche village and to prioritise pedestrians, make increased short term parking available for shoppers, and improve the quality of the environment and in so doing deter rat-running through Higher Trezaise, Trezaise, the village of Roche, and Victoria Road.</p> <p>c) Where reasonably practicable, that a footpath is established along Victoria Road as part of the new road scheme to provide safe pedestrian access between Roche Village and the railway station/ employment at Victoria.</p> <p>In the absence of a full A30-St Austell link road, this plan supports the principle of the delivery of a new road linking Harmony Road to Edgumbe Road north of the settlement boundary (see Fig 2.3) to address the traffic issues in Roche.</p> <p>Proposals for residential development in excess of 5 units within this plan area will be required to make a proportionate contribution to cost of the delivery of the Harmony Road to Edgumbe Road road link (or in the alternative the A30-St Austell Link Road if it can be demonstrated that A30-St Austell link is committed and a contribution to its cost has been secured).</p>

3.2.1 This Policy '*...supports the principle of an A30-St. Austell link road west of Roche...*' and '*...The new road scheme seeks to include an HGV diversion banning HGV movements through Roche village from the Combellack turning off Trezaise Road to the south of Roche Village, and from the Victoria Rail bridge north of Roche, and into the village from Harmony Road east of the new road, and into Edgumbe Road south of the new road. HGVs to be directed instead onto the new link road (Fig 2.3)...*'

3.2.2 The route identified for the new section of road identified within the Neighbourhood Plan, is not currently fixed and it is important to note that the actual text of the policy a) only expresses 'support' for such a link road (since the neighbourhood planning body has no power to do any more than that) and b) only explicitly supports the 'principle' of a link road. These are two key factors in forming a view as to the likely significant effects of the policy (as distinct from the likely significant effects of any particular route alignment ultimately chosen by the highways authority). However, the Policy does make explicit reference to Figure 2.3. Although Figure 2.3 is clearly marked 'Indicative Only', the way in which it is referenced in policy does make an obvious link between the policy and the particular route which has been illustrated in Figure 2.3.

- 3.2.3 During the development of the Neighbourhood Plan, Cornwall Council carried out a study to determine possible routes for this link. The current identified location of the link road in Figure 2.3 is at its closest located approximately 30 metres from Breney Common and Goss & Tregoss Moors SAC and up to a maximum distance of 360 metres. The HGV diversion would result in an increase of HGVs using the B3274 (Edgcumbe Road), Harmony Road, Cleers Hill and North Road, all of which are partly located either immediately adjacent to the SAC or within 30 metres of it, for a total distance of approximately 1km. Further to this is it is likely that the new link road would result in an increase in car traffic as well as HGV traffic along the route of the road identified in Fig 2.3 of the Neighbourhood Plan.
- 3.2.4 The Neighbourhood Plan '*supports in principle*' the link road and associated HGV diversion. In addition the supporting text identifies that '*Cornwall Council has long standing policy to achieve an improved A30-St. Austell link road*', making it clear that the competent authority for promoting such a link road application would be Cornwall Council rather than Roche Parish Council. This is further clarified in the supporting text which states that '*Cornwall Council is now carrying out detailed investigation of this route and alternatives, preparatory to a possible funding bid*'. This text also clarifies that at this point the link road does not even have funding, nor has investigation of alternatives been completed; proposals are clearly still at an early stage.
- 3.2.5 As such, the making of the Neighbourhood Plan would not, and could not, deliver or facilitate the A30-St. Austell link road and HGV diversion. Policy B1 merely expresses backing for the principle of such a scheme.
- 3.2.6 The construction of an A30-St. Austell link road and associated HGV diversion certainly does have potential for the following potential impact pathways to interact with the SAC, depending on the final alignment chosen:
- Increases in air pollution from increased atmospheric nitrogen deposition from vehicles has potential to impact upon vegetation of the SAC;
 - Runoff from new sections of road have potential to alter the hydrology of the SAC and introduce water carried pollutants to the SAC;
 - Dust from construction of new sections of road have the potential to impact upon vegetation of the SAC; and
 - Salt from de-icing roads can impact upon vegetation within proximity to a road. While sections of link road that are already operational highway may not result in a greater impact than is already the case, new sections of highway to complete the link road could do so.
- 3.2.7 All of these potential impacts can be avoided through careful selection of the precise route of any link road. This is discussed below.

Air quality

- 3.2.8 According to the Department of Transport's Transport Analysis Guidance, "*Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant*"¹⁷.
- 3.2.9 The link road route as depicted in Figure 2.3 would involve construction of a new section of road within 200m of the SAC and also potentially an increase in both car and HGV traffic within 200m of the SAC. These both have potential to impact up on the vegetation for which the SAC is designated. Acidification and nitrogen deposition as a result of increased road traffic could impact upon the SAC designated habitats (heathland and wetland habitats in particular). Further assessment and transport modelling would be required for any planning application to determine the potential air quality impacts.

¹⁷ www.webtag.org.uk/archive/feb04/pdf/feb04-333.pdf

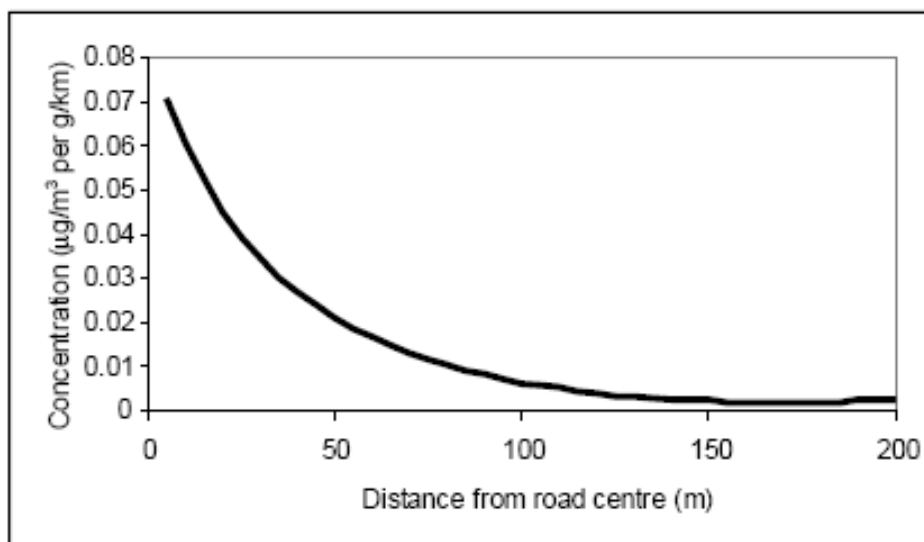


Figure 2: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT)

3.2.10 Department for Transport guidance as expressed in the Design Manual for Roads and Bridges (DMRB)¹⁸ states that the first process in determining air quality impacts from schemes that may alter vehicle movements on the highway network is to determine whether the road in question is an 'affected road' which is defined as, among other criteria, if it will experience an increase in flows of more than 1,000 Average Annual Daily Traffic (AADT) and more than 200 heavy duty vehicles (HDV) per day. If either of these thresholds is reached, the project would likely trigger further traffic modelling and air quality modelling to determine the impact of the road on the SAC.

Runoff

3.2.11 Runoff from a road scheme can result in likely significant effects upon designated habitats associated with the SAC. Increase in runoff can result in successional change, altering dynamics of habitat/species composition may result (particularly the case for wetland components of the SAC). Water levels within wet heaths should also be maintained to avoid adverse changes to the characteristic plant composition of the habitat.

3.2.12 Surface water runoff from new roads could potentially enter the SAC, depending on final scheme alignment and detailed drainage design. There are standard mitigation techniques available to avoid such an impact arising in practice depending on the final alignment chosen.

Dust deposition

3.2.13 Construction activities can lead to the emission of dust particles into the air, which will be deposited on nearby vegetation. In sufficient quantities dust can smother vegetation, preventing light penetration to the chloroplasts and blocking stomata thus interrupting photosynthesis and transpiration. In prolonged cases, death can result. On a large construction site (such as a road scheme) dust can (if significant dust generating activities are occurring) temporarily coat vegetation up to 100m away without mitigation. As such, due to the distance of the link road scheme and associated HGV diversion from the SAC, this impact pathway is present and would need considering during detailed scheme design. There are standard mitigation techniques available to avoid such an impact arising in practice depending on the final alignment chosen.

Salt spray

3.2.14 Rock salt, sodium chloride, is used for de-icing roads and paths. Salt damage to vegetation can occur through both salt contaminated soils and water courses or through salt spray. Current guidance¹⁹ relates to trees rather than vegetation, however, similar impacts will result in other types of vegetation. Current guidance identifies that effects of salt spray are most strongly felt within 5m of a roadside treated with salt, as such, due to portions of the road route planned for the HGV diversion abutting the SAC this potential impact pathway is present.

¹⁸ Design Manual for Roads and Bridges, Volume 11 Environmental Assessment, Section 3 Environmental Assessment Techniques, Part 1: Air Quality

¹⁹ Forest Research (2011) Pathology Advisory Note (No. 11). De-icing salt damage to trees.

3.2.15 As noted within this section, this policy contains impact pathways that do have the potential to result in a likely significant effect upon Breney Common and Goss & Tregoss Moors SAC, if this or any similar route was eventually to be chosen and promoted by Cornwall County Council. This would need considering during detailed scheme design for any new sections of road, depending on their final alignment.

3.3 Recommendations relating to Policy B1

3.3.1 This section is divided into two parts. The first sets out those measures that are within the remit of the Neighbourhood Plan and would be appropriate for inclusion in policy. The second discusses further controls that are more applicable to later stages of link road development.

Measures within the direct control of the Neighbourhood Plan

3.3.2 Although the text of Policy B1 is clear that it is only *expressing support* for the link road, and moreover is only expressing support for the *principle* of the link road (rather than any specific detailed route), the policy also refers directly to Figure 2.3 which does depict a specific route, albeit one marked 'Indicative Only'. It is recommended that the policy either removes explicit reference to Figure 2.3 (since reference to Figure 2.3 is not necessary for the policy to be effective) or makes it clear that Figure 2.3 is only included as an informative example of how the route may look.

3.3.3 In addition, Policy B1 states that '*Support for this route is subject to the following conditions ...*' It is recommended that for absolute clarity (given the depiction in Figure 2.3 of a route which could potentially result in likely significant effects on Breney Common and Goss & Tregoss Moors SAC) the following text is included as a criterion: '*That the scheme will not result in an adverse effect on the integrity of any internationally important wildlife sites, either alone or in combination with other plans and projects*'.

Measures beyond the direct control of the Neighbourhood Plan

3.3.4 At this stage, the actual route of the link road is not determined and alternatives are still being investigated. In the process of further developing the scheme and a final alignment there will be many factors to take into consideration and this is primarily a matter for the local highways authority.

3.3.5 As an initial step, opportunities to keep new sections of link road more than 200m from any European sites should be investigated. Where that is not possible (and for all stretches that are existing highway within 200m of the SAC) it will be necessary for the scheme developers to follow Department for Transport and Environment Agency/ Natural England guidance in investigating transport flows and air quality impacts. This involves air quality assessment to determine whether the scheme would result in an increase in NOx concentrations or nitrogen deposition rates on all European sites within 200m, and demonstration that:

- It will not lead to an increase equivalent to more than 1% of the critical load/level²⁰ for the most sensitive habitat; or
- The combined background and additional deposition/concentrations will not exceed 70% of the critical load/level for the most sensitive habitat; or
- The increase in deposition will exceed these thresholds but will not result in an adverse effect on the habitats in question.

3.3.6 The final scheme should fully investigate potential for impacts via surface runoff and salt spray associated with new section(s) of road and the final alignment for new (or widened/realigned) sections of road should be chosen accordingly.

3.3.7 The final scheme should not result in any proposals for landtake from the SAC as such proposals are unlikely to be legally justifiable on the grounds of both 'no alternatives' and 'imperative reasons of over-riding public interest'²¹.

²⁰ The critical load or level being the threshold below which there is a very high degree of confidence that no effect would arise

²¹ These are the two legal tests which must be met where a proposal will result in an adverse effect on an internationally important wildlife site that cannot be avoided or adequately mitigated to remove the effect.

- 3.3.8 It is understood that these processes should be undertaken by the scheme developers and highways authority rather than by Roche Parish Council and that they fall outside the direct remit of neighbourhood planning.

3.4 Policy B2: (Potential development of Site D)

Table 2: Policy wording of Neighbourhood Plan Policy B2: (Potential development of Site D)

Policy Text	
Development of Site D (Fig 2.4), (which shall include an equipped local play area, provision of open, natural space and sufficient Cornish hedges and tree cover along the road to screen noise) will only be supported for a low density development of up to 150 houses, provided that any planning permission results in either:	
(i)	a proportionate contribution to the delivery of the A30-St Austell link road (including appropriate means to prevent through traffic passing through Roche village) if it can be demonstrated that A30-St Austell link is committed and a contribution to its cost has been secured, and there is a reasonable prospect of its delivery; or alternatively
(ii)	an enforceable contract for the construction of the new link road has been agreed by Cornwall Council for the delivery of the Harmony Road to Edgecumbe Road link subject to the following conditions: <ul style="list-style-type: none"> a) Upon opening of the new road HGV movements will be prevented through Roche village from the Combellack turning off Trezaise Road to the south of Roche Village, and from the Victoria Rail bridge north of Roche, and into the village from Harmony Road east of the new road, and into Edgecumbe Road south of the new road. HGVs will be directed instead on the route shown (see map attached). b) No more than 50 new homes in this contingent allocation can be occupied until: <ul style="list-style-type: none"> - the new road has been completed and the HGV diversion established - Street works and traffic calming to support the HGV ban by HGVs from Trezaise Road, Roche Village centre and Victoria Road are completed - a pavement is established along Victoria Road linking Roach Village to Victoria - there is evidence that sufficient school places can be accommodated at Roche Village School to meet local needs including any additional demand from new homes c) A children's play area and open, natural public space including trees and/or Cornish hedges to mitigate road noise is included in the new development d) The conditions for the allocation of this site for 150 homes will also be considered met if the new A30-St.Auslell link route referred to in Policy 2 is built, subject to the conditions in Policy B1 and condition B2 d) above
The costs of meeting the above conditions will be taken into account in determining S106 contributions from the 150 home contingent allocation, the extent of affordable delivery being subordinate to delivery of the new road link.	

- 3.4.1 Policy B2: (Potential development of Site D) identifies the development of Site D, which includes the provision of 150 new homes. This policy merely identifies a site allocation. The quantum, of housing to be provided within Cornwall, and thus within the Parish of Roche is being determined within Cornwall's emerging Local Plan and has already been subject to HRA, and as such does not require revisiting within the Neighbourhood Plan HRA.
- 3.4.2 Policy B2: (Potential development of Site D) also identifies that delivery of Site D is contingent on the delivery of the A30-St. Austell link road, as such Natural England have expressed concern that this site has the potential to result in the same impact pathways as detailed in the **Section 3.2** that could link to Breney Common and Goss & Tregoss Moors SAC. In our view, it is the link road that will lead to the pathways and if there is no link road then there will be no pathways of impact. The only way it could be said to 'give rise' any effect would be if the allocation made the road scheme more likely to be delivered or were it to advance the date of delivery. However, this is not the case with Policy B2. Nonetheless, we have recommended some amendments to Policy B2 to be precautionary.

3.5 Recommendations relating to Policy B2

- 3.5.1 To ensure robustness, it is recommended that amendments are made to Policy G1 (Protection of wildlife). These are detailed later in this document with Section 3.8. It is also suggested that Policy B2 references the conditions set out in Policy B1 and specifically the recommended addition to those conditions: *'That the scheme will not result in an adverse effect on the integrity of any internationally important wildlife sites, either alone or in combination with other plans and projects'*.

3.6 Policy C1: (Employment and development)

Table 3: Policy wording of Neighbourhood Plan Policy C1: (Employment and development)

Policy Text	
Employment related development will be supported:	
(i)	within the settlement boundary of Roche, where it results in small scale commercial development which is in keeping with its immediate context;
(ii)	in the area between the existing Business Park and Cornwall Services (see map), subject to the following conditions:
	a). A safe pedestrian route being established along Victoria Road to Roche;
	b). All new proposals for development must be accompanied by a Travel Plan which shows the volume of HGV traffic that is likely to be created by the new development. The Travel Plan must show the likely routes of any additional HGV traffic travelling from or to the site. Any development which would result in increased HGV traffic through Roche / Trezaise will not be supported.

3.6.1 This policy provides for '*small scale commercial development...between the existing Business Park and Cornwall Services*' at the parcel of land identified within the Figure 2.5 of the Neighbourhood Plan. This parcel of land is located approximately 200m south of the River Camel SAC, separated by the A30. From reviewing freely available aerial photography and mapping, there do not appear to be any watercourses within the area identified within Figure 2.5 that pass under the A30 and thus enter the River Camel SAC. There are watercourses located within the proposed site that run along the A30 in an east-west direction and Natural England has confirmed that one of these crosses the road northwards under the A30 into the SAC, providing a surface water connection. This would require further investigation at a project level and the design of appropriate measures (such as buffer zones, drainage interceptors and SuDS as appropriate to ensure no net increase in runoff rates as a result of the development compared to greenfield). The policy does not specify the layout of the development in this area and therefore does not preclude the use of all measures to protect flows and water quality northwards into the River Camel SAC. However it would add clarity and robustness to the policy to specifically declare the removal of support if adverse effects on the integrity of any European site were likely to arise.

3.6.2 In addition to potential water quality impacts the interest features of the River Camel SAC (salmon and otter are specifically cited in Natural England's letter although the site is also designated for bullhead and for its woodland and heathland habitats) would be potentially sensitive to noise and vibration impacts. However, the minimum 200m separation between any development and the intervening presence of two roads (one of which is the A30) leads to a conclusion that no noise or vibration associated with development under Policy C1 would be perceived in the SAC. .

3.7 Recommendations relating to Policy C1

3.7.1 Policy C1 states that support would be '*subject to the following conditions ...*' It is recommended that for absolute clarity the following text is included as a criterion: '*That the scheme will not result in an adverse effect on the integrity of any internationally important wildlife sites, either alone or in combination with other plans and projects*'.

3.8 Recommendations relating to Policy G1 (Protection of wildlife)

3.8.1 Policy G1 (Protection of wildlife) is the policy within the Neighbourhood Plan which provides protection for wildlife and could also provide full protection for European designated sites, thus ensuring that no likely significant effects result

3.8.2 To ensure that no likely significant effects occur as a result of policies within the Neighbourhood Plan, it is recommended that amendments are made to Neighbourhood Plan Policy G1: (Protection of wildlife). At present the policy only provides protection for '*wildlife of the Parish*', providing no explicit protection for European designated sites. It is noted that Policy 23a: (European Protected Sites) within the Cornwall's emerging Local Plan provides explicit protection for European designated sites, and that this Neighbourhood Plan will be in compliance with this Countywide Local Plan, however, as this Parish does contain three European designated sites, for robustness it is recommended that the Roche Neighbourhood Plan provides explicit protection for European designated sites to ensure that no likely significant effects arise.

3.8.3 To ensure that the Neighbourhood Plan provides suitable protection against likely significant effects of European designated sites, both within and outside of the Parish Council boundary (i.e. in

combination with other projects or plans), and in-line with Cornwall's emerging Local Plan. In correspondence to the Parish Council²², Natural England suggested the following wording to be incorporated into Policy G1: (Protection for wildlife):

3.8.4 'Sites of European importance

The highest level of protection will be given to sites of European importance within the Parish (i.e. potential, candidate and existing Special Protection Areas, and possible, candidate and existing Special Areas of Conservation and Ramsar sites). Proposals having an adverse impact on the integrity of such sites will not be permitted other than in exceptional circumstances. Measures to avoid any adverse impacts on these sites will be sought as a first principle.'

- 3.8.5 Further to this it is recommended that Policy G1 (Protection of wildlife), include the requirement for the provision of project specific HRA screening to accompany any planning application where required: *'Where risk of Likely Significant Effects on internationally important wildlife sites exists, proposals will be supported when a Habitat Regulations Assessment is undertaken to demonstrate that no likely significant effects will arise. Where likely significant effects cannot be screened out, appropriate assessment will be required and, if necessary, measures to avoid adverse effects on the integrity of those sites'.*

3.9 Conclusion

- 3.9.1 Provided the recommendations outlined in this chapter are incorporated into the Neighbourhood Plan, it is considered that the Roche Neighbourhood Plan will not result in any likely significant effects on European sites, either because there is no impact pathway or because the plan would provide safeguards requiring further analysis at the project level and removing support from any detailed scheme that resulted in adverse effects on integrity that could not be adequately mitigated or avoided. The subsequent Chapter undertakes HRA screening of the Neighbourhood Plan in combination with other projects and plans.

²² Email to the Client from Natural England dated 17th February 2016.

4 In-combination Assessment

4.1 Cornwall's emerging Local Plan and associated amendments

- 4.1.1 The Roche Neighbourhood Plan is essentially encompassed within the Cornwall Local Plan, in that the overall strategic need for housing and employment development is set by the Local Plan and the Neighbourhood Plan must be in conformity with the Local Plan. As such, strategic matters concerning the quantum of development (both housing and employment) to be delivered in the vicinity of Roche have been factored into the strategic HRA of the Cornwall Local Plan (e.g. air quality and recreational activity). There is therefore no potential for an 'in combination' effect in that development at Roche is subsumed within the overall levels of development being planned for across Cornwall.

4.2 Connecting Cornwall: 2030 Strategy

- 4.2.1 This document is Cornwall's third Local Transport Plan (LTP3). The LTP3 sets out the vision, goals, objectives and policies for transport to 2030. The LTP3 for Cornwall does not identify any specific transport schemes and insufficient detail is provided to enable full HRA. The LTP3 states '*It will only be possible to undertake this level of assessment once specific projects are proposed once sufficient detail is available at the Implementation Plan level to enable a thorough and robust analysis to be carried out...*' '*...project level HRA will be required to present information necessary to reach a definitive conclusion. Where projects conclude that adverse impacts cannot be avoided through mitigation, the individual project will need to present an assessment of alternatives and set out an imperative reasons of overriding public interest case and establish the requirements for compensatory measures.*'
- 4.2.2 As such, this Plan can be screened out from acting in combination with Roche's Neighbourhood Plan.

4.3 Specific known projects

- 4.3.1 HRA documentation that supports the emerging Local plan identifies that 'Although local Energy from Waste sites within Cornwall which have recently been permitted could theoretically contribute to atmospheric deposition on some of these sites (such as Breney Common and Goss & Tregoss Moors SAC) it is understood that air quality analysis has determined that no adverse effect on the integrity of any European site will result.' In addition, air quality modelling was undertaken of the impact of the Local Plan upon Breney Common and Goss & Tregoss Moors SAC. This concluded that '*total cumulative NO_x concentrations are predicted to remain below the actual critical level of 30 µg m⁻³. Since the critical level (the empirically established concentration above which some adverse effects on vegetation may potentially occur) will not be exceeded there is no possibility of an adverse effect on the vegetation for which the European sites are designated.*'
- 4.3.2 As such, this Plan can be screened out from acting in combination with Roche's Neighbourhood Plan.

5 Conclusions

5.1 Introduction

5.1.1 Following consultation with Natural England, the following Policies within the Neighbourhood Plan have been subject to HRA:

- Policy B1: (Link Road west of Roche)
- Policy B2: (Potential development of Site D)
- Policy C1: (Employment and development)

5.1.2 These policies were identified to have potential impact pathways linking to the following European designated sites:

- Breney Common and Goss & Tregoss Moors SAC; and,
- River Camel SAC.

5.1.3 Impact pathways discussed within this report include:

- Air pollution
- Runoff
- Dust
- Direct land take
- Salt
- Water quality

5.2 Recommendations

5.2.1 Following screening of the above policies, the following recommendations have been made to ensure that likely significant effects do not arise as a result of the Roche Neighbourhood Plan either alone or in combination with other projects or plans.

Recommendations relating to Policy B1

5.2.2 This section is divided into two parts. The first sets out those measures that are within the remit of the Neighbourhood Plan and would be appropriate for inclusion in policy. The second discusses further controls that are more applicable to later stages of link road development.

Measures within the direct control of the Neighbourhood Plan

5.2.3 Although the text of Policy B1 is clear that it is only *expressing support* for the link road, and moreover is only expressing support for the *principle* of the link road (rather than any specific detailed route), the policy also refers directly to Figure 2.3 which does depict a specific route, albeit one marked 'Indicative Only'. It is recommended that the policy either removes explicit reference to Figure 2.3 (since reference to Figure 2.3 is not necessary for the policy to be effective) or makes it clear that Figure 2.3 is only included as an informative example of how the route may look.

5.2.4 In addition, Policy B1 states that '*Support for this route is subject to the following conditions ...*' It is recommended that for absolute clarity (given the depiction in Figure 2.3 of a route which could potentially result in likely significant effects on Breney Common and Goss & Tregoss Moors SAC) the following text is included as a condition: '*That the scheme will not result in an adverse effect on the integrity of any internationally important wildlife sites, either alone or in combination with other plans and projects*'.

Measures beyond the direct control of the Neighbourhood Plan

- 5.2.5 At this stage, the actual route of the link road is not determined and alternatives are still being investigated. In the process of further developing the scheme and a final alignment there will be many factors to take into consideration and this is primarily a matter for the highways authority.
- 5.2.6 As an initial step, opportunities to keep new sections of link road more than 200m from any European sites should be investigated by the local highways authority. Where that is not possible (and for all stretches that are existing highway within 200m of the SAC) it will be necessary for the scheme developers to follow Department for Transport and Environment Agency/ Natural England guidance in investigating transport flows and air quality impacts. This involves air quality assessment to determine whether the scheme would result in an increase in NOx concentrations or nitrogen deposition rates on all European sites within 200m, and demonstration that:
- It will not lead to an increase equivalent to more than 1% of the critical load/level²³ for the most sensitive habitat; or
 - The combined background and additional deposition/concentrations will not exceed 70% of the critical load/level for the most sensitive habitat; or
 - The increase in deposition will exceed these thresholds but will not result in an adverse effect on the habitats in question.
- 5.2.7 The final scheme should fully investigate potential for impacts via surface runoff and salt spray associated with new section(s) of road and the final alignment for new (or widened/realigned) sections of road should be chosen accordingly.
- 5.2.8 The final scheme should not result in any proposals for landtake from the SAC as such proposals are unlikely to be legally justifiable on the grounds of both 'no alternatives' and 'imperative reasons of over-riding public interest'²⁴.
- 5.2.9 It is understood that these processes should be undertaken by the scheme developers and highways authority rather than by Roche Parish Council and that they fall outside the direct remit of neighbourhood planning.

Recommendations relating to Policy B2

- 5.2.10 To ensure robustness, it is recommended that amendments are made to Policy G1 (Protection of wildlife). These are detailed later in this Section. It is also suggested that Policy B2 references the conditions set out in Policy B1 and specifically the recommended addition to those criteria: *'That the scheme will not result in an adverse effect on the integrity of any internationally important wildlife sites, either alone or in combination with other plans and projects'*.

Recommendations relating to Policy C1

- 5.2.11 Policy C1 states that support would be *'subject to the following conditions ...'* It is recommended that for absolute clarity the following text is included as a criterion: *'That the scheme will not result in an adverse effect on the integrity of any internationally important wildlife sites, either alone or in combination with other plans and projects'*.

Recommendations relating to Policy G1 (Protection of wildlife)

- 5.2.12 Policy G1 (Protection of wildlife) is the policy within the Neighbourhood Plan which provides protection for wildlife and could also provide full protection for European designated sites, thus ensuring that no likely significant effects result
- 5.2.13 To ensure that no likely significant effects occur as a result of policies within the Neighbourhood Plan, it is recommended that amendments are made to Neighbourhood Plan Policy G1: (Protection of wildlife). At present the policy only provides protection for *'wildlife of the Parish'*, providing no explicit protection for European designated sites. It is noted that Policy 23a: (European Protected Sites) within the Cornwall's emerging Local Plan provides explicit protection for European designated sites, and that this Neighbourhood Plan will be in compliance with this Countywide Local Plan, however, as this Parish does contain three European designated sites, for robustness it is recommended that the Roche Neighbourhood Plan provides explicate protection for European designated sites to ensure that no likely significant effects ensue.

²³ The critical load or level being the threshold below which there is a very high degree of confidence that no effect would arise

²⁴ These are the two legal tests which must be met where a proposal will result in an adverse effect on an internationally important wildlife site that cannot be avoided or adequately mitigated to remove the effect.

5.2.14 To ensure that the Neighbourhood Plan provides suitable protection against likely significant effects of European designated sites, both within and outside of the Parish Council boundary (i.e. in combination with other projects or plans), and in-line with Cornwall's emerging Local Plan. In correspondence to the Parish Council²⁵, Natural England suggested the following wording to be incorporated into Policy G1: (Protection for wildlife):

5.2.15 *'Sites of European importance*

The highest level of protection will be given to sites of European importance within the Parish (i.e. potential, candidate and existing Special Protection Areas, and possible, candidate and existing Special Areas of Conservation and Ramsar sites). Proposals having an adverse impact on the integrity of such sites will not be permitted other than in exceptional circumstances. Measures to avoid any adverse impacts on these sites will be sought as a first principle.'

5.2.16 Further to this it is recommended that Policy G1 (Protection of wildlife), include the requirement for the provision of project specific HRA screening to accompany any planning application where required: *'Where risk of Likely Significant Effects on internationally important wildlife sites exists, proposals will be supported when a Habitat Regulations Assessment is undertaken to demonstrate that no likely significant effects will arise. Where likely significant effects cannot be screened out, appropriate assessment will be required and, if necessary, measures to avoid adverse effects on the integrity of those sites'.*

5.3 Overall conclusion

5.3.1 Provided the above recommendations are incorporated into the Neighbourhood Plan, it can be concluded that Roche's Neighbourhood Plan will not result in a likely significant effect upon European designated sites, either because there is no impact pathway or because the plan would provide safeguards requiring further analysis at the project level and removing support from any detailed scheme that resulted in adverse effects on integrity that could not be adequately mitigated or avoided.

²⁵ Email to the Client from Natural England dated 17th February 2016.

Appendix A. Figure A1. Locations of European Designated Sites

Appendix B. European Designated Sites Summary

B.1 Breney Common and Goss & Tregoss Moors SAC

B.1.1 Qualifying Features of the SAC

- Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath;
- European dry heaths;
- Transition mires and quaking bogs; Very wet mires often identified by an unstable `quaking` surface; and,
- *Euphydryas (Eurodryas, Hypodryas) aurinia*; Marsh fritillary butterfly.

B.1.2 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 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.

B.1.3 Environmental Vulnerabilities

- Undergrazing;
- Inappropriate scrub control;
- Hydrological changes;
- Drainage;
- Wildfire/ arson;
- Habitat fragmentation;
- Water pollution; and,
- Air pollution: impact of atmospheric nitrogen deposition.

B.2 River Camel SAC

B.2.1 Qualifying Features of the SAC

- European dry heaths;
- Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles; Western acidic oak woodland;
- Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*); Alder woodland on floodplains;
- *Salmo salar*; Atlantic salmon;
- *Cottus gobio*; Bullhead; and,
- *Lutra lutra*; Otter.

B.2.2 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 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.

B.2.3 Environmental Vulnerabilities

- Water pollution;
- Inappropriate weirs and dams and other structures;
- Invasive species;
- Water abstraction;
- Forestry and woodland management; and,
- Deer.

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