Habitats Regulations Assessment of the Impact on European Protected Sites of the Rochdale Borough Draft Local Plan (Reg 18 consultation)

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1. Introduction

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

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

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

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

1.4 It is noted that the Plan being assessed may be subject to further amendments. Further Appropriate Assessments may therefore be required if changes are made as a result of future consultations or a future Examination in Public.

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

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

1.6 This document forms Stage 1 and Stage 2 of the Habitats Regulation Assessment (HRA) process and contributes to the fulfilment of the Council's statutory duty as regards Article 6(3). It is an Opinion and an Assessment of whether the Rochdale Local Plan (Regulation 18 consultation stage) may have a significant effect on the special interest of any European designated protected sites.

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

1.7 Stage 1 – Screening

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

- An effect is likely if it 'cannot be excluded on the basis of objective information' (Waddenzee C127-02 ∞ 45). This requires consideration and a conclusion made against known and presented data/survey or results/scientific evidence (e.g. literature review).

- An effect is significant if it 'is likely to undermine the conservation objectives' [of the European protected site (Waddenzee (C127-02 ∞ 48)]. This excludes from consideration other impacts not related to the qualifying features and their conservation objectives.

- In undertaking a screening assessment for likely significant effects 'it is not that significant effects are probable, a risk is sufficient, but there must be credible evidence (see above) that there is 'a real, rather than a hypothetical, risk' Boggis v Natural England & Waveney District Council. This refines the understanding of the 'precautionary principle' as it applies to the Habitats Regulations.

- The Sweetman (case C258-11) also offers some simple guidance that the screening step 'operates merely as a trigger', in order to progress to further assessment stages through the process.

1.8 Stage 2 – Appropriate Assessment

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

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

relevant requirements of the Habitats Regulations, should be 'appropriate' to the level of plan or project that it addresses.

Government guidance says:

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

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

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

1.9 In-Combination Assessment

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

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

- Places for Everyone Joint Development Plan Document (2024);
- Greater Manchester Joint Minerals DPD (2013);
- Greater Manchester Joint Waste DPD (2012);
- Other Supplementary Planning Documents and Local Plans.

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

1.10 The Competent Authority

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

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

Government guidance in this regard which seems relevant to plans, outline proposals or operations which might require an additional consent/permit from a third party indicates:
- a competent authority is permitted to grant a plan or project consent which leaves the applicant free to determine subsequently certain parameters relating to the construction phase, only if that authority is certain that the consent includes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

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

1.11 The Greater Manchester Ecology Unit

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

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

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

1.12 This report assesses the 'Rochdale borough draft Local Plan (Regulation 18 consultation Stage)' (2025). It is recognised that as the name suggests the Plan provides a framework for all development in Rochdale and that land currently not allocated may come forward for development during the period of the Plan. This HRA will therefore likely be subject to amendment as Plans and associated projects progress.

The assessment takes into account the likely cumulative impacts (in-combination effects) of other Plans, Strategies and Projects within the wider Greater Manchester city region and beyond.

2.0 Brief description of the Plan

2.1. The Plan being assessed is the Rochdale borough draft Local Plan (Regulation 18 consultation) 2025.

2.2. The primary purpose of the Local Plan is to guide development proposals within the Borough of Rochdale up to 2039.

The overall Spatial Vision for the Plan for Rochdale is that by 2039 -

People, Place, Planet - Planning for Resilient Growth

The Local Plan will support the Council's priorities by tackling health, poverty and environmental inequalities, minimising the impacts of climate change, and creating opportunities that will improve the lives and prospects of everyone. It is a spatial portrait of how we will manage the use of land and natural resources to deliver resilient growth for all. By 2039, our Local Plan for Resilient Growth will have enabled investment in our people, places, and planet, and helped us respond to the significant challenges and opportunities we face in a rapidly changing world.

Rochdale will be a more vibrant and attractive place to live and work, with a strong economic core around the transformative investment at Atom Valley, which will provide space for high value business development and innovation, as a driver for economic growth in the city-region. Residents will be able to access high quality jobs due to significant investments in transport infrastructure, linking new and existing residential areas. New job opportunities will help to deliver a more prosperous borough with improved living standards, higher wages and a more skilled workforce.

Our town centres will be revitalised, as attractive places to live, work, and spend leisure time in, linked by high quality public realm and spaces for walking and cycling. Delivering new homes in sustainable locations in town centres and near railway stations, as well as through strategic sites, will significantly broaden the housing offer in the borough. New development will be designed to a high quality to support active lifestyles and sustainable travel, which will improve the health and wellbeing of residents.

The energy demands of homes, buildings, transport and infrastructure will be reduced and more renewable energy will be produced and used locally. Investment in our green infrastructure will help us to make space for nature, reduce the local impacts of climate change, air pollution and flood risk, and create a more attractive place for people to live, work and visit. A more resilient natural environment will be central to economic growth and people's quality of life.

The Strategic Objectives for the Plan are –

SO1: A Sustainable and Resilient Place

- Contributing the Greater Manchester target of net zero by 2038.
- Requiring all development to be highly energy efficient with a target of zero carbon by 2028.
- Supporting the production of renewable energy where appropriate.
- Increasing the borough's resilience to the effects of climate change, with a focus on nature-based solutions.
- Reducing the likelihood of flooding though appropriate flood risk management.
- Minimising waste and adverse impacts to the environment from pollution.

SO2: A Prosperous Place

- Deliver the Atom Valley Mayoral Development Zone to transform the local economy
- Maximise the opportunities presented by the Sustainable Materials and Manufacturing Centre (SMMC) to meet the ambitions to build a world class cluster of advanced materials and manufacturing in Atom Valley
- Support improvements to skills through training and education to maximise the benefits of this economic growth for local people

- Establishing strong, thriving and attractive town centres which provide a range of services and meet the needs of the community
- Delivering more homes in our town centres to create sustainable communities and increase vibrancy
- Building on the borough's tourism assets to create a strong visitor economy
- Support economic growth through the provision of high-quality green, social and transport infrastructure

SO3: A Place for Homes

- Delivering the number of homes required to meet housing need and support economic growth
- Improving the range of housing to meet needs and aspirations, including affordable housing and more high value housing
- Creating well-designed, desirable housing areas to retain and attract residents
- Focusing housing growth on sustainable locations where it helps to deliver regeneration and economic growth (e.g. Town Centres and close to railway stations)
- Deliver homes for specific groups that addresses local needs whilst creating strong and successful communities
- Ensuring that new housing is supported by community facilities, service infrastructure and high-quality green and blue infrastructure

SO4: A Greener Place

- Ensure that all development achieves nature positive outcomes which deliver wider social, economic and environmental benefits
- Protect, maintain, enhance and expand a resilient, well-connected and high-quality network of green and blue infrastructure to deliver multiple benefits
- Recognise the value of watercourses and their settings, and promote their positive management to create attractive, healthy, resilient places
- Protect and enhance biodiversity and support nature recovery
- Value landscapes to help achieve well-designed places, plan for climate change, and conserve and enhance the natural environment

SO5: A Place for People

- Prioritises health and wellbeing in all aspects of managing the built and natural environment and therefore supporting healthier lifestyles
- Social value is embedded into new development, thereby delivering positive outcomes for all residents
- Communities have easier access to social infrastructure enhancing opportunities for improving health and wellbeing and reducing health inequalities.
- Ensuring the design of buildings, places and spaces delivers equity for all
- Expecting good quality education and skills-based learning opportunities are available for all members of the community from early-years onwards.
- Create, protect and enhance distinctive places and buildings by understanding their contribution to the wider setting
- Across the borough, the preservation and restoration of heritage and conservation buildings and important sites are prioritised and enhanced
- Ensure access to a network of high-quality open spaces for formal and informal sport and recreation, which also delivers wider benefits for nature and supports efforts to address climate change

SO6: A Connected Place

- Direct development to the most accessible locations (town / local centres and public transport corridors) or those that can be made more accessible by sustainable transport;
- Deliver strategic transport connections to drive economic growth in the Atom Valley Mayoral Development Zone and new and existing developments, including to the regional centre and key destinations both in and outside the Borough;

- Extend the Bee Network to offer more travel choice, maximising walking, wheeling, cycling and public transport opportunities and reduce the number and length of single occupancy car journeys;
- Ensure new development contributes to transport improvements and the use of public and other sustainable transport;
- Support measures to enhance safety and access to vulnerable road users including people with impaired mobility, protect traffic sensitive town centres and residential communities and provide street environments that are more appealing to travel along and spend time; and
- Reduce emissions from traffic to support delivery of the Greater Manchester Clean Air Plan, 2050 Transport Strategy and GM “Right Mix” targets for modal shift through healthier travel behaviour and technical innovations to improve network operation.

3.0 Identification of European designated sites concerned

3.1 This Assessment has first screened all European sites in the region to generate a long list and then assess which of these sites are likely to be affected by future development in Rochdale. There are two European designated sites within the boundaries of Rochdale, the Rochdale Canal Special Area of Conservation and the South Pennine Moors Special Area of Conservation and Special Protection Area; in addition when assessing the impact of a Plan on European protected sites it is important to consider the impact on sites not only within the administrative area covered by the Plan but also those which fall outside the Plan boundary, as these could still potentially be affected by the operation of the Plan.

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

The Screening Criteria

3.2 In carrying out the initial screening process, the Assessment has considered the main possible **sources** of effects on the European sites arising from the Plan, possible **pathways** to the European sites and the effects on possible sensitive **receptors** in the European sites. Only if there is an identifiable source, a pathway and a receptor is there likely to be a significant effect.

3.3 Possible sources and pathways for effects arising from development in Rochdale on the identified Sites and used in the screening of European sites are considered to be:

- Water pollution and impacts on hydrology via watercourse, surface water and groundwater moving from sites in Rochdale to European sites (habitat damage and species loss);
- Air pollution, primarily transport related via road traffic (habitat damage);
- Increased recreational disturbance of European sites and functionally linked land* (species disturbance and habitat damage);
- Risk of invasive non-native species introduction via waterways (habitat and species impacts);
- Loss of functionally linked land;
- Direct habitat loss within European sites;
- Noise and Visual Disturbance;
- Light spillage and/or shading.

** functionally linked land is land outside of designated sites but which is regularly used by key species associated with a designated site and which is considered to be key to the survival of the species concerned*

3.4 Guidance and precedence concerning distances at which significant effects on European sites are caused by water or air pollution has been taken into account during the screening of European sites. Recommended buffer zones for certain types of 'most damaging' operations (eg air pollution from vehicles and recreational disturbance) have been used in the screening of sites. The buffer zones are based on the distances before air pollution sources and recreational disturbance become so diffuse so as to be indiscernible or impossible to ascribe to particular source. Outside of these buffer zones significant effects on European sites arising from water and air pollution are considered unlikely to arise. The precautionary buffer used for this HRA is 20 km.

3.5 Natural England also publish SSSI 'Impact Risk Zones' (IRZs) providing guidance on the types of development which should be considered for their possible impacts on SSSIs and which impacts should be considered. All European designated sites are also designated as

SSSIs. IRZs have also been taken into account when screening European sites that could be affected by the Plan.

3.6 The nine authorities involved for the Places for Everyone (PfE) strategic plan (including Manchester) have published a supplementary planning document (SPD) covering Holcroft Moss (part of the Manchester Mosses SAC). An SPD has also been adopted by Oldham, Rochdale and Tameside Councils covering the South Pennines SAC/SPA. These documents have also been taken into account when Screening European sites that could be affected by the Plan.

3.7 Although guidance concerning buffer zones/risk zones has been taken into account when screening European protected sites, in the case of a Plan affecting the development of an entire metropolitan area, buffer/risk zones should be regarded as important but ***not*** as definitive; for example, this buffer zone may not be sufficient when assessing certain very large-scale developments, secondary impacts, or cumulative impacts where pathways to receptor sites are rivers, air pollution is a factor or the receptor site is sensitive to recreational pressure resulting from an increase in population.

3.8 Taking the above into account the following European sites are Screened In owing to proximity to Rochdale (within 20km) or because there are likely pathways between Rochdale and the designated sites -

- Manchester Mosses SAC (diffuse air pollution impacts),
- Rochdale Canal SAC (direct and indirect impacts),
- South Pennines Moors SAC/SPAs Parts 1 and 2 (direct and indirect impacts).

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

- Liverpool Bay SPA– whilst theoretically hydrologically linked to Rochdale via the Roch-Irwell-Mersey pathway the distance from Rochdale (over 30km) and the volume of water in Liverpool Bay is such that any pollutants generated in Rochdale could not be reasonably attributed to any likely significant effects owing to a reduction in water quality detected in Liverpool Bay SPA.

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

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

4.1 Potential impacts of development managed by the Plan on European sites and therefore Screened In include -

- Water pollution and impacts on hydrology via watercourse, surface water and groundwater moving from sites in Rochdale to European sites (habitat damage and species loss);
- Air pollution, primarily transport related via road traffic (habitat damage);
- Increased recreational disturbance of European sites and functionally linked land* (species disturbance and habitat damage);
- Risk of invasive non-native species introduction via waterways (habitat and species impacts);
- Loss of functionally linked land;
- Direct habitat loss within European sites;
- Noise and Visual Disturbance;
- Light spillage and/or shading.

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

4.2 Direct Habitat Loss

Direct Habitat Loss could affect the Rochdale Canal SAC and the South Pennine SPA/SAC, since parts of these designated sites are location within Rochdale.

4.3 Water Quality

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

4.3.2 Of the list of designated sites considered, diffuse water pollution could have an effect on the Rochdale Canal Special Area of Conservation (SAC)

The Rochdale Canal SAC has been designated because it supports important populations of aquatic plant communities. These plant communities could be harmed by increased water pollution.

4.4 Air Quality

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

- Oxides of Nitrogen (NO_x);
- Ammonia (NH_3);
- Dust;
- Sulphur Dioxide (SO_2);

- Low level Ozone (O_3);
- Acid deposition caused from chemical reactions to NO_x, SO_2 and CO_2.

4.4.1 Of these NOx (nitrates) are the most likely to arise as a result of development controlled by the Plan under consideration here. Dust and low-level ozone only have effects very close to the source. Ammonia emissions are most closely associated with certain types of intensive agricultural production not identified as a significant land-use within Rochdale. SO_2 emissions are associated with certain industrial operations such as paper pulp, cement and smelting and burning of fossil fuels such as coal and oil.

The main sources of these pollutants are road traffic. The greatest damage caused by nitrates occurs within 200 - 250m of the source. Development within Rochdale could cause increases in localised traffic pollution and could also generate road traffic over a much wider area. Where proposed developments within Rochdale are likely to result in increases of these pollutants arising, they have been screened into this Assessment.

4.4.2 The issue of diffuse air pollution is complicated by the fact that the South Pennines and the Manchester Mosses European sites are already exceeding nitrate levels in some places which would be considered harmful to sensitive habitats on these sites (*source* Natural England and Air Pollution Information System (APIS)), so any level of increased nitrate pollution no matter how small could be considered to be harmful.

4.4.3 A joint Supplementary Planning Document has been produced by the nine Places for Everyone authorities providing guidance on when levels of traffic generation are likely to require mitigation with regards to Holcroft Moss, part of the Manchester Mosses SAC. The current guidance is that any development that generates more than 100 vehicle movements along the M62 or 20 HGV's will exceed the threshold. This includes development within Rochdale.

4.4.4 For the South Pennines SAC/SPA and other parts of the Manchester Mosses SAC no guidance is currently available. They have therefore been screened-in using the precautionary principle. However, it is noted that the HRA of the Places for Everyone Strategic Plan concluded that there would be no discernible impacts arising on the South Pennine Moors designated sites arising from increases in air pollution.

4.4.5 Whilst no significant new heavy industrial processes are currently proposed in the Plan applications may come forward that have emissions that would require permitting by the Environment Agency. Any such application should therefore be accompanied by an Air Quality Assessment that includes potential effects on European protected sites.

4.5 Recreational Pressure

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

Recreational use of an internationally designated site has potential to:

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

4.5.1 The European protected sites considered to be potentially most at risk from increased recreational pressures are the Rochdale Canal SAC, the Manchester Mosses SAC, and the South Pennine Moors SAC/SPA.

4.5.2 The Rochdale Canal SAC has been designated because it supports important populations of aquatic plants. Increases in recreational canal boat use along the Canal could cause harm to aquatic plants. Boat movements along the Canal, and populations of notable aquatic plant species, are monitored and controlled by the Canal and Rivers Trust.

4.5.3 The South Pennines SPA and SAC are in part promoted as recreation destinations and are therefore potentially vulnerable to an increase in population in Rochdale.

4.5.4 However, Natural England have advised that there is no available evidence that recreational disturbance of the South Pennines SPA or SAC will result in any likely significant effects. (*ref. letter dated 7th August 2024 from Natural England to the GMCA, South Pennine Moors Special Area of Conservation (SAC) / Special Protection Areas (SPAs) Joint Supplementary Planning Document*). the South Pennines SPA/SAC can therefore effectively be screened out of this HRA.

4.6 Functionally Linked Land

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

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

4.6.1 There is a risk of land in Rochdale being functionally linked to the South Pennine Moors SAC/SPA because of the proximity of the designated sites to other suitable upland land in the borough, and as the qualifying species are primarily mobile bird species that can regularly use land outside the designated areas. For this reason, risk to functionally linked land associated with the South Pennine Moors SAC/SPA has been Screened-in.

4.7 Light Spillage and Shading

These effects could affect plant communities in the Rochdale Canal SAC.

4.8 Noise and Visual Disturbance

These effects could affect notable bird species associated with the South Pennine Moors, if development encroaches within or close to the boundaries of the designated sites.

4.9 Introduction of invasive species

This could potentially affect the Rochdale Canal SAC through mobilisation of contaminated land associated with development close to the Canal.

4.10 Summary Results of Screening of Sites

From the Screening process, the following European designated sites have been identified as having some potential to be affected by development proposed and planned for within the Rochdale Local Plan (Regulation 18 consultation stage):

- Manchester Mosses SAC;
- Rochdale Canal SAC
- South Pennine Moors SPA/SAC (Parts 1 and 2);

5.0 The Nature Conservation Interest of the "Screened In" European Sites

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

5.1 Manchester Mosses SAC

5.1.1 Description of the Manchester Mosses SAC

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

5.1.2 Primary Reason for Designation of the Manchester Mosses SAC

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

5.1.3 Conservation Objectives of the Manchester Mosses

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

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

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

5.1.4 Supplementary Advice on Conserving and Restoring

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

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

5.2 Rochdale Canal SAC

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

Conservation Objectives

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

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

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

- Human induced changes in hydrological conditions
- Invasive non-native species;
- Changes in abiotic conditions;
- Water pollution
- Air pollution, air-borne pollutants;
- Biocenotic evolution, succession.
- Recreational disturbance, especially increases in canal boat traffic

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

5.3.1 Description

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

5.3.2 Primary Reason for Designation

Qualifying species

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

In any season:

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

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

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

Non-qualifying species of interest:

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

5.3.3 Conservation Objectives

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

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

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

5.4 South Pennine Moors SAC

5.4.1 Description

This site covers the key moorland blocks of the Southern Pennines from Ilkley Moor in the north to the Peak District in the south. The moorlands are on a rolling dissected plateau formed from rocks of Millstone Grit at altitudes of between 300m – 600m and a high point of over 630m at Kinder Scout. The greater part of the gritstone is overlain by blanket peat with the coarse gravely mineral soils occurring only on the lower slopes. The moorlands as a whole support a breeding bird community of national and international importance. The site is representative of upland dry heath, which covers extensive areas, occupies the lower slopes of the moors on mineral soils or where peat is thin, and occurs in transitions to acid grassland, wet heath and blanket bogs. The upland heath of the South Pennines is strongly dominated by *Calluna vulgaris – Deschampsia flexuosa* heath and *C. vulgaris – Vaccinium myrtillus* heath. More rarely *C. vulgaris – Ulex gallii* heath and *C. vulgaris –*

Erica cinerea heath are found. On the higher, more exposed ground *V. myrtillus – D. flexuosa* heath becomes more prominent. The smaller area of wet heath is characterised by cross-leaved heath *Erica tetralix* and purple moor grass *Molinia careulea*. The site also supports extensive areas of acid grassland largely derived from dry and wet heath. In the cloughs, or valleys, which extend into the heather moorlands, a greater mix of dwarf shrubs can be found together with more lichens and mosses. The moors support a rich invertebrate fauna, especially moths, and important bird assemblages. This site also contains areas of blanket bog, although the bog vegetation communities are botanically poor. Hare's-tail cotton-grass *Eriophorum vaginatum* is often overwhelmingly dominant and the usual bog-building Sphagnum mosses are scarce. Where the blanket peats are slightly drier, heather *C. vulgaris,* crowberry *Empetrum nigrum* and bilberry *V. myrtillus* become more prominent. The cranberry *Vaccinium oxycoccus* and the uncommon cloudberry *Rubus chamaemorus* is locally abundant in bog vegetation. Bog pools provide diversity and are often characterised by common cotton-grass *E. angustifolium*. Substantial areas of the bog surface are eroding, and there are extensive areas of bare peat. In some areas, erosion may be a natural process reflecting the great age (up to 9000 years) of the South Pennine peats. Around the fringes of the upland heath and areas of bog are blocks of old sessile oak woods, usually on slopes. These tend to be dryer than those further north and west, such that the bryophyte communities are less developed (although this lowered diversity may in some instances have been exaggerated by the effects of 19th century air pollution). Other components of the ground flora such as grasses, dwarf shrubs and ferns are common. Small areas of alder woodland along stream-sides add to the overall richness of the woods. The moorland also supports a range of flush and fen habitats associated with bogs, cloughs, rivers and streams. Although generally small scale features they have a specialised flora and fauna, which makes a great contribution to the overall biodiversity of the moors. Acid flushes are the most common type and these include transition mires and quaking bogs characterised by a luxuriant carpet of bog mosses Sphagnum spp., rushes and sedges.

5.4.2 Qualifying Features

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

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

5.4.3 Conservation Objectives

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

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

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

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

6.0 Initial Screening Opinion

6.1 The Screening Criteria

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

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

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

- The source is the direct or indirect changes (land take, emissions to air or water, hydrological changes) potentially occurring as a result of the development at an identified site.

- The pathway is the route or mechanism by which any likely significant effect would manifest in the environment and would reach the receptor.

- The receptor is the European Site and more specifically the qualifying features and conservation objectives for the site.

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

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

- Water Pollution;
- Direct land Take;
- Air pollution resulting from increased vehicular emissions and industry;
- Increased recreational pressure;
- Loss and disturbance of functionally linked land;
- Introduction of invasive species;
- Noise and visual disturbance;
- Shading and light spillage

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

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

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

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

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

Table 6.1 Initial Screening Summary of impacts of the Draft Rochdale Local Plan (consultation stage) on European sites

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

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
A Sustainable and Resilient Place				
S1	Sustainable and Energy Efficient Development	Sustainable Development	No likely significant effects	Screened Out
S2	Climate Resilience	Sustainable Development	No likely significant effects	Screened Out
S3	Renewable and Low Carbon Energy Infrastructure	Sustainable Development	No likely significant effects	Screened Out
S4	Managing water resources and flood risk	Sustainable Development	No likely significant effects	Screened Out
S5	Reducing the impact of pollution, contamination and land instability	Sustainable Development	No likely significant effects	Screened Out
A Place for Homes				
H1	Delivering the right amount of housing in the right places	Housing	Potential significant effects	Screened In
H2	Delivering the right types of homes	Housing	No likely significant effects	Screened Out
H3	Providing affordable homes	Housing	No likely significant effects	Screened Out
H4	Meeting the needs of gypsies, travellers and travelling show people	Housing	No likely significant effects	Screened Out
H5	Housing for older people and people with disabilities	Housing	No likely significant effects	Screened Out

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
H6	Homes for looked after children and care givers	**Housing**	No likely significant effects	**Screened Out**
H7	Houses in multiple occupation	**Housing**	No likely significant effects	**Screened Out**
H8	Householder applications	**Housing**	No likely significant effects	**Screened Out**
A Greener Place				
G1	Nature positive development	**Environment**	No likely significant effects	**Screened Out**
G2	Rochdales Green Network	**Environment**	No likely significant effects	**Screened Out**
G3	Green infrastructure and new development	**Environment**	No likely significant effects	**Screened Out**
G4	Watercourses and their settings	**Environment**	No likely significant effects	**Screened Out**
G5	Urban Greening	**Environment**	No likely significant effects	**Screened Out**
G6	Protecting trees, hedgerows and woodland	**Environment**	No likely significant effects	**Screened Out**
G7	Biodiversity and geodiversity	**Environment**	No likely significant effects	**Screened Out**
G8	Conserving and enhancing the landscape	**Environment**	No likely significant effects	**Screened Out**
A Place for People				
PE1	A well-designed Borough	**People**	No likely significant effects	**Screened Out**

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
PE2	Achieving a Healthy Place	**People**	No likely significant effects	**Screened Out**
PE3	Health and Wellbeing	**People**	No likely significant effects	**Screened Out**
PE4	Enhancing local distinctiveness and improving local character	**People**	No likely significant effects	**Screened Out**
PE5	Preserving Heritage in the Borough	**People**	No likely significant effects	**Screened Out**
PE6	Delivering services and facilities in the community	**People**	No likely significant effects	**Screened Out**
PE7	Providing social value across the borough	**People**	No likely significant effects	**Screened Out**
PE8	Improving facilities for education and skills in the Borough	**People**	No likely significant effects	**Screened Out**
PE9	Residential development and school places	**People**	No likely significant effects	**Screened Out**
PE10	Open space for sport and recreation	**People**	No likely significant effects	**Screened Out**
A Prosperous Place				
PR1	Hierarchy of Centres	**Economy**	No likely significant effects	**Screened Out**
PR2	Creating vibrant main town centres	**Economy**	No likely significant effects	**Screened Out**
PR3	Primary shopping areas in town centres	**Economy**	No likely significant effects	**Screened Out**

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
PR4	Local and district centres and local shops	**Economy**	No likely significant effects	**Screened Out**
PR5	Out of centre retail and leisure uses	**Economy**	No likely significant effects	**Screened Out**
PR6	Delivering employment floorspace	**Economy**	Potential significant effects	**Screened In**
PR7	Business, industry and warehousing development	**Economy**	Potential significant effects	**Screened In**
PR8	Office development	**Economy**	Potential significant effects	**Screened In**
PR9	Employment zones and existing employment sites	**Economy**	No likely significant effects	**Screened Out**
PR10	Promoting the visitor and rural economy	**Economy**	Potential significant effects	**Screened In**
A Connected Place				
T1	Delivering transport priorities	**Transport**	No likely significant effects	**Screened Out**
T2	Creating sustainable streets	**Transport**	No likely significant effects	**Screened Out**
T3	Parking provision and drop-off facilities	**Transport**	No likely significant effects	**Screened Out**
T4	Transport statements, assessments and travel plans for new development	**Transport**	No likely significant effects	**Screened Out**
T5	Accessibility criteria	**Transport**	No likely significant effects	**Screened Out**
T6	Bee active travel – walking wheeling and cycling	**Transport**	No likely significant effects	**Screened Out**

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
T7	Bee Network – public transport	**Transport**	No likely significant effects	**Screened Out**
T8	Strategic road network	**Transport**	Potential significant effects	**Screened In**
T9	Local highway network	**Transport**	No likely significant effects	**Screened Out**
T10	Maximising local transport network operation	**Transport**	No likely significant effects	**Screened Out**
Development Management				
DM1	General development requirements	**Development management**	No likely significant effects	**Screened Out**
DM2	Delivering planning contributions and infrastructure	**Development management**	No likely significant effects	**Screened Out**

6.0 Summary of Policies Screened In

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

- H1 – Delivery of the right amount of housing in the right places
- PR6 – Delivering employment floorspace
- PR7 – Business, industry and warehousing development
- PR8 – Office development
- PR10 – Promoting the visitor economy
- T8 – Strategic road network
-

The Policies 'Screened In' relate to

- the aspiration for the Plan to deliver significant numbers of new homes within the Borough,
- the aspiration for the Plan to deliver economic growth within the Borough,
- the aspiration for the Plan to provide improved strategic road transport links

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

- direct habitat losses,
- increased habitat and species disturbance,
- increases in diffuse air pollution,
- increases in diffuse water pollution,
- increases in recreational pressures,
- disturbance to functionally linked land,
- visual and noise disturbance,
- introduction of invasive plant species.

6.2 The details of the potential effects of the above impacts and the consequent effects on European sites are difficult to empirically determine at this time and at this stage of Plan production. Rather, it is the *broad principle* of whether the scale and type of development planned for Rochdale can be implemented without harming the special interest of any European Protected Sites that is being tested in this Assessment.

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

from the Plan or substantially amended, and also indicates areas where future Assessments can be ruled out.

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

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

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

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

- Policy S5 - Reducing the impact of pollution, contamination and land instability
- Policy G1 – Nature positive development
- Policy G3 – Green infrastructure and new development
- Policy G4 – Watercourses and their settings
- Policy G7 – Biodiversity and geodiversity

In addition, since this Plan needs to be assessed in combination with Places for Everyone, Policies in PfE related to the protection of the natural environment will also act to mitigate potential LSE.

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

- Recreational pressure – pathways to Rochdale Canal SAC (boat traffic), South Pennines SPA/SAC,
- Air quality – vehicular pathway to Manchester Mosses SAC (primarily to Holcroft Moss which is adjacent to the M62 motorway) and the South Pennines SPA/SAC,
- Water quality – pathways to the Rochdale Canal SAC,
- Impacts on functionally linked land – South Pennines SPA/SAC,
- Direct habitat losses – South Pennines SPA/SAC and Rochdale Canal SAC,
- Habitat and Species disturbance – South Pennines SPA/SAC and Rochdale Canal SAC
- Light spillage and shading – Rochdale Canal SAC
- Spread of invasive species – Rochdale Canal SAC

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

7.0 Appropriate Assessment

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

- Recreational pressure – pathways to Rochdale Canal SAC (boat traffic), South Pennines SPA/SAC,
- Air quality – vehicular pathway to Manchester Mosses SAC (primarily to Holcroft Moss which is adjacent to the M62 motorway) and the South Pennines SPA/SAC,
- Water quality – pathways to the Rochdale Canal SAC,
- Impacts on functionally linked land – South Pennines SPA/SAC,
- Direct habitat losses – South Pennines SPA/SAC and Rochdale Canal SAC,
- Habitat and Species disturbance – South Pennines SPA/SAC and Rochdale Canal SAC
- Light spillage and shading – Rochdale Canal SAC
- Spread of invasive species – Rochdale Canal SAC

7.2 Air Quality

7.2.1 The air pollutants most likely to have a significant effect on European sites are the oxides of nitrogen (NO_x) resulting from traffic emissions. Modern regulation of commercial emissions makes any other form of air pollutant extremely unlikely.

7.2.2 NO_x deposition results in an increase in nitrates and can have a significant impact on certain habitats including lowland mosses and upland blanket bogs. Open water habitats can also be susceptible where the importance is linked to low nutrient levels in the water.

7.2.3 NO_x can also impact existing vegetation by lowering the pH *ie* acidification analogous to the acidification caused by high levels of SO_2 to the South Pennines from coal fires.

7.2.4 Studies indicate that the main impact of NO_x is when within 200m of a pollution source *ie* road or major transport depot.

Manchester Mosses SAC

7.2.5 This habitat type is considered sensitive to changes in air quality, especially acidity and nitrogen. Critical values are currently being exceeded at this SAC (APIS, 2016).

Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.

7.2.6 The part of this SAC most at risk is Holcroft Moss as it lies immediately adjacent to the M62 with an estimated 129,000 vehicle movement per day between the M6 and M60 in 2024. As the critical nitrogen and NO_x levels are already regarded as above the critical load for the Manchester Mosses, theoretically any increase in road traffic along the M62 as a result of the operation of the Rochdale Local Plan could have a negative impact on this part of the SAC. Both Risley Moss and Bedford Moss are located at significant distance

from any trunk road and are unlikely to be impacted upon by traffic issues originating as a result of the Plan.

7.2.7 Policies promoting the economic growth of Rochdale and housing growth could theoretically increase traffic levels on this section of the M62 to and from Rochdale.

7.2.8 Air quality modelling was undertaken for the Places for Everyone large scale strategic plan for Greater Manchester. This modelling concluded that developments within Greater Manchester (including Rochdale) when acting in combination with developments in Warrington could cause LSE on Holcroft Moss by increasing emissions from traffic flow along the M62. In response to this identified LSE mitigation for air quality impacts was proposed in the form of the Supplementary Planning Document *"Holcroft Moss Planning Obligations Joint Supplementary Planning Document – May 2025"* adopted by the nine Places for Everyone authorities in consultation with Natural England. Mitigation for potential air pollution effects is also provided through Places for Everyone Policy JP-C8 (in particular criterion 17).

7.2.9 This SPD provides guidance on when mitigation in the form of developer contributions to the positive management of the Manchester Mosses SAC will be required for Holcroft Moss as a result of additional vehicle movements along the M62 corridor past Holcroft Moss. (between junction 11 Birchwood and Junction 12 Worsley). The triggers are 100 vehicles or 20 HGV's per day.

7.2.10 As Rochdale has already adopted this SPD, and the PfE plan has already accounted for the quantum of development anticipated for Rochdale up to 2039, it is reasonable to use the same criteria to assess housing and employment figures set out in the Rochdale Local Plan. Any development likely to increase traffic in excess of 100 vehicles or 20 HGV's should therefore provide mitigation as agreed in the SPD. Taking this into account, the adopted SPD and Policies integral both to the Local Plan and to PfE will effectively mitigate air pollution effects.

7.2.11 Integral Policies in the Plan including Policies S5 and GP7 will also act to protect European sites from air pollution effects.

South Pennine Moors SPA & SAC

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

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

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

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

7.2.16 Integral Policies in the Plan including Policies S5 and GP7 will also act to protect European sites from air pollution effects.

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

7.3 Recreational Pressure

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

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

South Pennine Moors SPA/SAC

7.3.3 Natural England have stated that there is insufficient evidence to demonstrate that recreational activities are having any effect on the special interest of the South Pennine Moors designated sites (*ref. letter dated 7th August 2024 from Natural England to the GMCA, South Pennine Moors Special Area of Conservation (SAC) / Special Protection Areas (SPAs) Joint Supplementary Planning Document*).

Manchester Mosses SAC

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

7.3.5 Of the distinct parts to the Manchester Mosses SAC, Astley and Bedford Mosses is more than 20km from the boundary with Rochdale, with Holcroft Moss and Risley Moss located more than 20km respectively as the crow flies to the nearest point of the Rochdale borough.

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

Rochdale Canal SAC

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

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

7.4 Water Quality

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

7.4.2 Generally for such an impact to occur there needs to be a hydrological pathway such as a water course or ground water. European sites with direct hydrological connectivity to Rochdale include the Rochdale Canal SAC and the South Pennine Moors SAC/SPA.

7.4.3 In the case of the Rochdale Canal SAC Policies S5, G4 and G7 will act to adequately mitigate for any possible harm to the Canal.

7.4.4 In the case of the South Pennine Moors, it is noted that water flow is from the Moors down into more urban areas. There is no possibility of contaminated water flowing into the designated site from new developments, and currently no new development in planned for within the designated sites.

7.4.5 Should any development be proposed in future within the designated site, Policies S5, G4 and G7 will act to adequately mitigate for any possible harm which could arise from water pollution effects.

7.5 Direct Habitat Losses

7.5.1 Currently no new significant development is planned within Rochdale which could lead to direct habitat losses to European sites.

7.5.2 Should any development be proposed in future within designated sites leading to direct habitat losses, Policies S5, G4 and G7, and the South Pennine Moors SPD, will act to adequately mitigate for any possible harm which could arise from water pollution effects.

7.6 Direct loss and disturbance of Functionally Linked Land within Rochdale.

7.6.1 Functionally linked land is land utilised by significant numbers of the qualifying species associated with a European site on a regular basis that is not part of the European site.

7.6.2 This most often applies to sites where birds are the qualifying species and forage or roost off-site. It could also apply to great crested newts that may move off-site in the winter to hibernate or to forage.

7.6.3 With regards to the Draft Rochdale Local Plan (Regulation 18 consultation stage), only birds are screened in as mobile species most likely associated with designated sites (most particularly the South Pennine Moors SPA/SAC

7.6.4 Currently there is no definitive map of potential functionally linked land within Rochdale Borough. However, given the ecology of the notable bird species most likely to be involved it is reasonable to assume that functionally linked land will be close to the boundary of designated sites and will not be close to significant settlements or substantive built development. The South Pennine Moors Special Area of Conservation

(SAC) / Special Protection Areas (SPAs) Joint Supplementary Planning Document prepared and adopted by Rochdale Council, Oldham Council and Tameside Council in 2025 provides safeguards for developments within 2.5 km of the Moors and requires development within this area to carry out project-based surveys and assessments. In addition, Policy JP-G5 (criterion 7) of the Places for Everyone Plan will act to mitigate effects on functionally linked land.

7.6.5 Policy G7 will also serve to mitigate for any potential impacts on functionally linked land.

7.6.6 It is concluded that sufficient mitigation is in place to avoid any likely significant effects on functionally linked land within Rochdale.

7.7 Habitat and Species Disturbance

7.7.1 This impact which could affect plant communities in the Rochdale Canal SAC will be effectively mitigated by Policies S5, G4 and G7.

7.7.2 Spread of invasive species

This impact which could affect plant communities in the Rochdale Canal SAC will be effectively mitigated by Policy G7.

7.8 Light spillage and shading

7.8.1 This impact which could affect plant communities in the Rochdale Canal SAC will be effectively mitigated by Policy G7.

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

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

Cumulative effects for air quality, recreational pressure, water quality, hydrology and in-direct effects on functionally linked land have been considered. There are unlikely to be cumulative effects for direct loss of functionally linked land, light spillage and shading, spread of invasive species or disturbance.

8.2 Air Quality

South Pennines SPA/SAC

8.2.1 Places for Everyone concluded that the cumulative impact of the Plan could result in slight increases in airborne pollution to parts of this extensive site along the A6024, A627 and A57. The A57 and A6024 are the Snake and Woodhead Passes across the Pennines. However, the PfE HRA also concluded that the increases in airborne pollutants would not affect any notable habitats and species associated with European sites.

8.2.2 Integrated Policies S5 and G7 within the Plan will also mitigate any possible air pollution effects.

8.2.3 It is concluded that there are no likely significant in-combination to the South Pennines SAC/SPA as a resulting from traffic generated by the Rochdale Local Plan.

Manchester Mosses SAC

8.2.4 Places for Everyone screened in air quality for the Manchester Mosses SAC, accepting that critical loads were already breached for Holcroft Moss and that the additional development across the nine PfE and Warrington Districts would add to this. The Warrington Local Plan also screened in the Manchester Mosses SAC because of additional traffic movements past Holcroft Moss. The Rochdale Local Plan will add further traffic movements. There is therefore the potential for a likely significant effect in-combination with the development proposals within Places for Everyone and the Warrington Local Plan as well as other local plans in preparation across Greater Manchester.

8.2.5 However an SPD has been produced by the nine local authorities involved in PfE, including Rochdale Council, which provides measures to mitigate for the increased traffic movements resulting from development proposals in Places for Everyone and the Warrington Local Plan. As Rochdale Council has adopted this SPD, which has been agreed with Natural England, providing that the agreed measures in the SPD are applied to development in Rochdale no likely significant effects on the Manchester Mosses SAC will occur in-combination.

8.3 Recreational Pressure

8.3.1 Whilst increased recreational pressure due to visitors from Rochdale has been screened out as having no likely significant effects on any Europeans sites in isolation, this does not necessarily mean that in combination with other plans significant effects could not occur.

8.3.2 The relevant sites with pathways for recreational disturbance effects from Rochdale are the South Pennines SPA/SAC and the Rochdale Canal SAC. As previously discussed, Natural England have stated that there is currently no empirical evidence that recreational disturbance is having significant effects on the South Pennines, and recreational pressures on the Rochdale Canal SAC are tightly controlled by the Canal and River Trust.

8.3.3 It is concluded that in-combination effects resulting from recreational pressure will not occur.

8.4 Water Quality

8.4.1 Whilst deterioration due to water pollutants originating from Rochdale has been screened out as having no likely significant effects on any Europeans sites, this does not mean that in combination with other plans could not result in significant effects occurring.

8.4.2 The sites with pathways from Rochdale include the Rochdale Canal SAC and the South Pennine Moors SPA/SAC.

8.4.3 Integrated Policies S5, G4 and G7 will serve to control water pollution in the Rochdale Canal SAC. There will therefore be no cumulative effects.

8.4.4 Given the remoteness of the South Pennine moors designated sites, the fact that water flows are generally away from the Moors, and the operation of integrated Policies S5, GP4 and GP7, I would conclude that no cumulative effects will occur.

8.6 Indirect effects on Functionally Linked Land

8.6.1 The South Pennine Moors Joint SPD prepared by Rochdale Council, Oldham Council and Tameside Council will effectively mitigate for any potential in-combination indirect effects on functionally linked land.

8.6.2 It can therefore be concluded that there are no likely significant in-combination effect to functionally linked land as a result of in-combination disturbance with the Rochdale Local Plan

9.0 Summary and Recommendations

9.1 Stage 1 of the HRA of effects of the Rochdale draft Local Plan (Regulation 18 consultation) on European designated sites established that there were pathways to the following European sites that could potentially cause Likely Significant Effects from the operation of certain Policies in the Plan -

- Manchester Mosses SAC
- Rochdale Canal SAC
- South Pennine Moors SPA/SAC

9.3 A number of the Policies within the Plan were initially identified (Screened In) as potentially having a likely significant effect (LSE) on European Sites due to one or more of the following:

- Water Pollution
- Air pollution resulting from vehicular emissions and industry;
- Increased recreational pressure,
- Direct habitat loss,
- Indirect disturbance,
- Loss of functionally linked land,
- Light spillage and shading,
- Spread of invasive species,

9.2 Further, more detailed Assessment of the possible effects of the operation of these Policies on the European Sites identified in the Screening process has been undertaken, both alone and in combination with other relevant plans and policies.

9.5 It was concluded that development managed by the Rochdale draft Local Plan (Reg 18 consultation) has the potential to cause likely significant effects on European sites in the absence of mitigation.

9.6 Mitigation for identified LSE is available, comprising –

- Holcroft Moss SPD
- South Pennine Moors SPD
- Integrated Plan Policies S5, G1, G3, G4, G7
- Places for Everyone Policies including JP-G5 and JP-C8

9.7 Following consideration of the available mitigation it has been concluded that, providing the available mitigation is applied appropriately, the operation of the Rochdale Local Plan (Reg 18 consultation stage) will not have any effects on the integrity of any European designated sites.

9.8 It is recommended that if any changes are made to the Policies in the Plan as a result of either the public consultation or during the Examination in Public, then the HRA will need to be revisited and revised to ensure that these changes would not result in effects on the integrity of any European designated sites.

9.9 It is recommended that wording within Policy H1 outlines that certain developments will require a project level Habitats Regulations Assessment (HRA) with regards to the Rochdale Canal SAC.

9.10 It is recommended that any development proposals which have the potential to cause foul and surface water discharges to water-sensitive designated sites should be subject to project-level HRA.

References

1. Warrington Borough Council Updated Proposed Submission version Local Plan: Amended HRA – August 2021 AECOM

2. Habitats Regulations Assessment of the Places for Everyone Joint Development Plan (submission) – February 2022 – GMEU

3. Holcroft Moss Planning Obligations Joint Supplementary Planning Document May 2025

4. South Pennine Moors SAC/SPA Joint Supplementary Planning Document May 2025

5. Annual Lockage Report 2024 - Canal & River Trust 2025

Appendix 1 – Location of European Sites

Figure 1 – Location of European Sites within 20 km of Rochdale