



**DARTMOOR NATIONAL PARK
PARTNERSHIP PLAN 2027-2032**

**HABITATS REGULATIONS ASSESSMENT
(HRA) REPORT**

August-September 2026

DARTMOOR NATIONAL PARK PARTNERSHIP PLAN 2027-2032

HABITATS REGULATIONS ASSESSMENT (HRA)

HRA SCREENING REPORT

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1.0 INTRODUCTION

The Dartmoor National Park Partnership Plan 2027-2032

- 1.1 Dartmoor National Park Authority (DNPA) is undertaking a review¹ of the Dartmoor National Park Partnership Plan (DNPPP). Fundamental to the review of the Partnership Plan are the two statutory² purposes of the National Park designation:

- to conserve and enhance the natural beauty, wildlife and cultural heritage
- to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public

Also, the duty of National Park Authorities in pursuing National Park purposes:

- to seek to foster the economic and social well-being of local communities (within the National Park) by working closely with the agencies and local authorities responsible for these matters

- 1.2 The draft DNPPP has been developed since 2024 through technical studies³ and wide consultation with partners, stakeholders and the public, including workshops and discussions held across the National Park. The Vision⁴ for Dartmoor remains a shared direction to 2045 and reflects a collective commitment to care for the National Park, balancing the needs of people and place, and building long-term resilience:

Dartmoor is a thriving and resilient landscape of moors and valleys, where nature, farming, communities and heritage flourish - where everyone feels welcome to live, work or visit

- 1.3 The Partnership Plan is the most important policy document for the National Park. This strategic, overarching plan is the principal vehicle for ensuring that the statutory purposes and duty are met and provides a mechanism for combining national and local priorities. The Dartmoor National Park Local Plan (DNPLP) provides the statutory planning framework for decisions regarding development and the use of land. Both plans are designed to help deliver the statutory purposes of the National Park, and are closely aligned in what they are seeking to achieve. The decisions that the Dartmoor Park Authority makes in relation to planning are also an important element of how the Partnership Plan will be delivered. A review of the DNPLP has recently commenced with plan scoping consultation⁵ until 23 August 2026.

¹ <https://www.dartmoor.gov.uk/living-and-working/partnership-plan>

² National Parks & Access to the Countryside Act 1949 as amended by the Environment Act 1995

³ <https://www.yourdartmoor.org/partnership-plan-review>

⁴ <https://www.yourdartmoor.org/the-vision>

⁵ <https://www.dartmoor.gov.uk/living-and-working/business/planning-policy/emerging-local-plan>

- 1.4 The preparation of the DNPPP has been informed by Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The DNPA commissioned independent specialist consultants Enfusion to undertake the statutory SEA process and the HRA process.

Habitats Regulations Assessment (HRA)

- 1.5 Habitats Regulations Assessment (HRA) refers to assessments that must be undertaken in accordance with the Habitats Regulations⁶ to determine if a plan or project may affect the protected features of a habitats site. The aim of the HRA process is to assess the potential effects arising from a plan or project against the nature conservation objectives of any site designated for its nature conservation importance. The initial HRA screening stage considers if the potential impacts arising as a result of the plan or project are likely to have a significant effect on these sites either alone or in combination with other plans and projects. If a risk of Likely Significant Effects (LSEs) is identified, then the process should progress to the Appropriate Assessment (AA) stage.
- 1.6 The HRA of the draft DNPPP has been undertaken in parallel to the SA, and the findings of the HRA have informed the SA. The HRA process has its own legislative drivers and requirements and while the different processes can inform each other, it is important that the HRA remains distinguishable from the wider SA process; the detailed method and findings are reported separately.

Consultation

- 1.7 The Habitats Regulations require the plan-making or competent authority (the Dartmoor National Park Authority) to consult the appropriate nature conservation statutory body – for England, Natural England (NE). The Habitats Regulations leave consultation with other bodies and the public to the discretion of the plan making authority. For the HRA of the DNPPP, the DNPA will also consult with the Environment Agency (EA) due to the presence of Atlantic Salmon, Otters and Blanket Bog – for which the EA advises it is the lead HRA partner. The draft HRA Report will be published alongside the draft Dartmoor National Park Partnership Plan for statutory and public consultation during late 2026.

Purpose & Structure of Report

- 1.8 This report documents the condition of Habitats sites (Appendix I). Methods are outlined in Section 2; Section 3 describes the HRA Screening, with summary and conclusions provided in Section 4. This HRA Report has been prepared to help the Dartmoor NPA, as the competent authority, discharge its duties under the Habitats Regulations.

⁶ [Conservation of Habitats & Species Regulations 2017 \(as amended\)](#)

2.0 HABITATS REGULATIONS ASSESSMENT & THE DRAFT DARTMOOR NATIONAL PARK PARTNERSHIP PLAN

Requirements for Habitats Regulations Assessment

- 2.1 European sites in England & Wales and their inshore waters (within 12 nautical miles of the coast) are protected by the Habitats Regulations 2017, as amended⁷. A competent authority, such as a National Park Authority, must carry out an assessment to test if a plan or project proposal could significantly harm the designated features of a European site⁸. The protected European sites comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).
- 2.2 UK Government policy also protects proposed SACs, potential SPAs, Ramsar sites⁹ (listed & proposed wetlands of international importance), and areas secured as sites compensating for damage to a European site. Together these sites protected by regulations and policy may be referred to as Habitats Sites. Plans and projects that are directly connected with or necessary to the management of a European site may be exempt from the HRA process. For all other plans and projects, the assessment is a staged process.
- 2.3 The process of HRA is based on the precautionary principle and evidence should be presented to allow a determination of whether the impacts of a plan, when considered individually or in combination with the effects of other plans and projects against the conservation objectives of a European Site (and Ramsar site), would adversely affect the integrity of the objectives for that site. Where effects are considered uncertain, the potential for adverse impacts should be assumed.

Guidance & Good Practice

- 2.4 The UK Government's guidance¹⁰ requires three stages to the HRA process:
 - Stage 1: Screening – to identify if the plan is likely to have any significant effects on the conservation objectives of the protected site(s)
 - Stage 2: Appropriate Assessment – to assess Likely Significant Effects (LSEs) in more detail and identify ways to avoid or minimise any effects
 - Stage 3: Derogation – to consider if the plan elements that would have an adverse effects on a European site qualify for an exemption

⁷ Conservation of Habitats and Species Regulations 2017 as amended (known as the Habitats Regulations)
<https://www.legislation.gov.uk/uksi/2017/1012/contents>

⁸ <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

⁹ support internationally important wetland habitats under the Convention on Wetlands of International Importance [Ramsar Convention]

¹⁰ <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

- 2.5 This HRA is being undertaken in accordance with Government guidance on Habitats Regulations Assessment protecting a European site (Defra 2021, updated 2023)¹¹, and with consideration of guidance from MHCLG on the appropriate assessment of plans and projects (2019)¹². The assessment has also considered the emerging changes to Government's guidance on HRA.
- 2.6 Defra held a public consultation (7 April to 19 May 2026) on proposed revisions¹³ to its guidance on HRA for England. The proposed changes seek to improve guidance with an increased emphasis on proportionality and on the level of precaution appropriate to the application of assessment thresholds.
- 2.7 It may be noted that these changes to HRA guidance are emerging during a time of wider change to environmental assessment and regulation – including changes from environmental impact assessment (EIA) and strategic environmental assessment (SEA) to the requirement for Environmental Outcomes Reports (EORs) arising from the LURA 2023¹⁴ and an increased mandate for the environmental regulators Environment Agency and Natural England. MHCLG published a roadmap to reform for Environmental Outcomes Reports in March 2026¹⁵. The new National Planning Policy Framework (NPPF)¹⁶ was published on 17 August 2026 and requires plan-making to undertake environmental assessment, where necessary. NPPF Policy N6 1 refers to sites of international importance as habitats sites.

Methods

- 2.8 This HRA is being undertaken in accordance with good practice, extant and emerging guidance on process, and with consideration of principles as follows:
- Using existing information & professional judgement
 - Proportionate assessment – the DNPPP is a strategic level plan
 - Avoiding duplication; Focused in-combination assessment
 - Early consultation with Natural England (and ongoing, as necessary)
- 2.9 The key stages of the HRA process and the specific tasks undertaken for each stage are set out in Table 2.1 as follows:

Table 2.1: HRA Key Stages

Stages	Habitats Regulations Assessment
Stage 1: Screening for Likely	1. Identify European & Habitats sites in and around the plan area.
	2. Examine the conservation objectives of each interest feature of the European & Habitats site(s) potentially affected.
	3. Analyse the plan and the changes to environmental conditions that may occur as a result of the plan. Consider the extent of the effects

¹¹ <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

¹² <https://www.gov.uk/guidance/appropriate-assessment>

¹³ https://consult.defra.gov.uk/protected-sites/8c7b61c8/user_uploads/draft-hra-guidance-text.pdf

¹⁴ Levelling Up and Regeneration Act 2023

¹⁵ <https://www.gov.uk/government/consultations/environmental-outcomes-reports-a-new-approach-to-environmental-assessment/outcome/environmental-outcomes-reports-roadmap-to-reform>

¹⁶ <https://www.gov.uk/guidance/national-planning-policy-framework>

Stages	Habitats Regulations Assessment
Significant Effects	on European & Habitats sites (magnitude, duration, and location) based on best available information.
	4. Examine other plans and programmes that could contribute (cumulatively) to identified impacts/effects.
	5. Produce screening assessment based on evidence gathered and consult statutory nature conservation body on findings.
	6. If significant effects are judged likely or uncertainty exists – the precautionary principle applies proceed to Stage 2.
Stage 2: Appropriate Assessment, including Mitigation Measures and Alternatives Assessment	1. Agree scope and method of Appropriate Assessment with statutory nature conservation body.
	2. Collate all relevant information and evaluate potential impacts on site(s) in light of conservation objectives.
	3. Consider how effect on integrity of site(s) could be avoided by changes to plan and the consideration of alternatives (e.g. an alternative policy/spatial location). Develop mitigation measures (including timescale and mechanisms for delivery).
	4. Prepare AA report and consult statutory body.
	5. Finalise AA report in line with statutory advice to accompany plan for wider consultation.

The Dartmoor National Park Partnership Plan 2027-2032

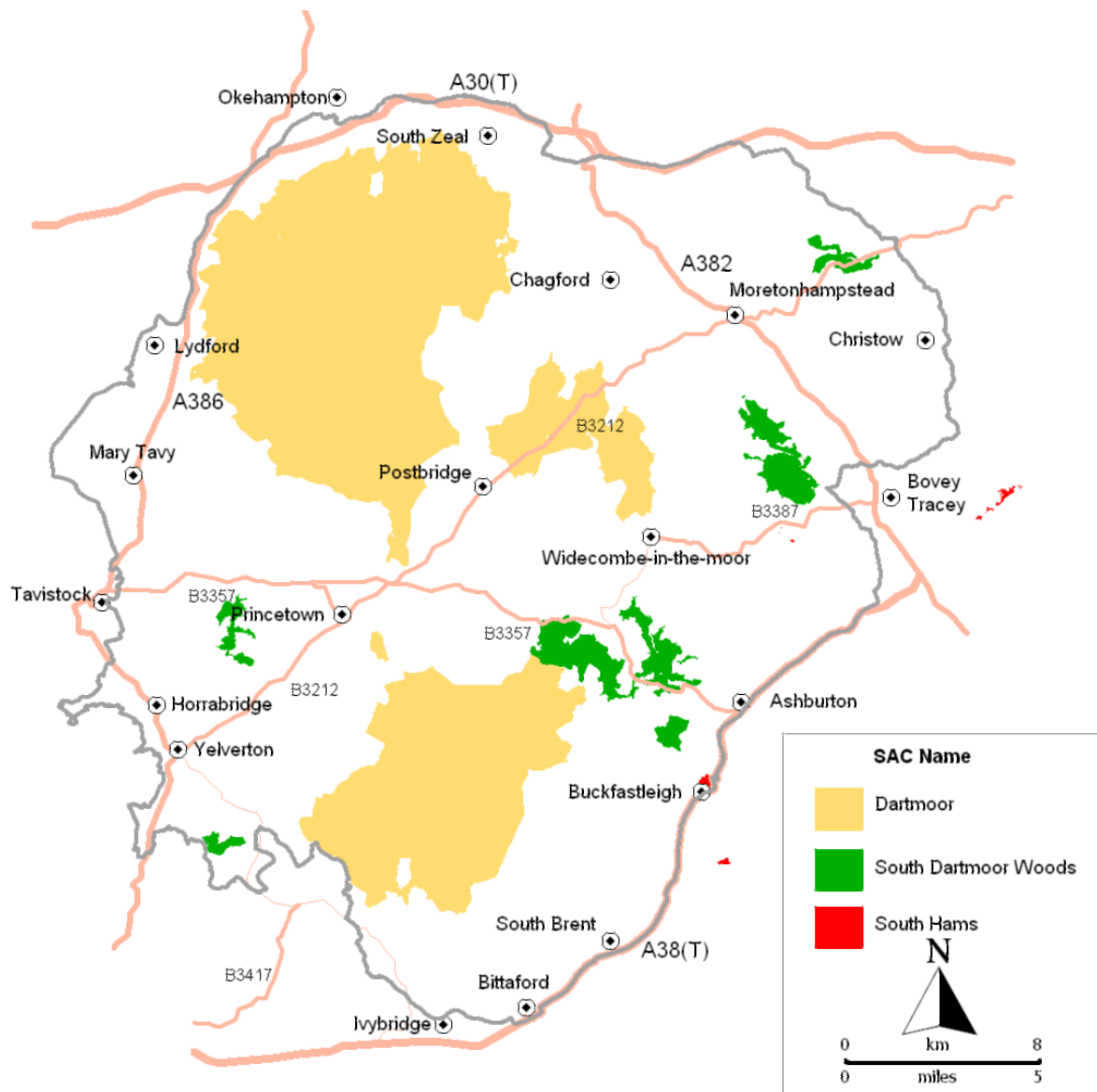
- 2.10 The draft Dartmoor National Park Partnership Plan 2027-2032 retains a long-term Vision for Dartmoor in 2045 with more detail set out in seven Themes, as follows:
- Climate Change (Cross-Cutting)
 - Better for the Next Generation (Cross-Cutting)
 - Better for Nature & Natural Beauty
 - Better for Cultural Heritage
 - Better for Farming & Forestry
 - Better for People
 - Better for Business & Communities
- 2.11 Five themes focus on the key areas of work across Dartmoor whilst the two cross-cutting themes recognise the priorities that influence and connect all areas of delivery for the plan. These cross-cutting themes are embedded throughout the plan, with specific outcomes and targets highlighting areas where coordinated action is particularly important.
- 2.12 For each specific theme, the DNPPP sets out draft Outcomes aligned with draft Targets that will be monitored including through periodic updates to the State of the Park report. Colour coding is carefully used to indicate which Outcome is cross-cutting or theme-specific. A monitoring and reporting section is included within the draft plan. Each Theme is supported by evidence through published review assessments and background papers¹⁷.
- 2.13 The Partnership Plan and the Local Plan are the two important statutory documents that guide activity, decision-making and investment on Dartmoor. Both have the same overall objective to help deliver National Park purposes.

¹⁷ <https://www.yourdartmoor.org/partnership-plan-review>

The Local Plan sets the policies that guide planning decisions about development and the use of the land. The Partnership Plan is a broader strategic plan that sets out the long-term vision for Dartmoor and provides the framework for partnership working to deliver this. It also provides the strategic context for more specific plans and strategies, for example on nature recovery or recreation management.

2.14 The location of the Dartmoor area with European Sites is shown, as follows:

Figure 2.2: Location of European Sites for the Dartmoor area



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Overall Approach to the HRA of the Partnership Plan

2.15 Whilst the Habitats Regulations require assessment for both plans and projects, it is recognised that the level of detail within a strategic plan, such as a

National Park Partnership Plan, is often insufficient to enable a comprehensive assessment. This contrasts with the assessment of a specific plan or project that might have very detailed information, for example, the Dartmoor Local Plan includes detailed policies on specific topics and detailed Site Allocations – and these have been subject to HRA screening and appropriate assessment¹⁸.

- 2.16 When undertaking HRA on a plan, it is important to ensure that the assessment is carried out at an appropriate scale and level of detail. The Dartmoor National Park Partnership Plan provides a strategic framework comprising a long-term Vision with draft Outcomes for two cross-cutting Themes and five topic specific Themes. The Partnership Plan does not include policies nor locationally specific plans or projects that are more likely to have identified significant effects on the protected Habitats sites.
- 2.17 This HRA has taken into consideration the findings of the HRA screening and appropriate assessment, together with comments from Natural England, on the adopted Dartmoor Local Plan. It has drawn upon the previous HRA screening (January 2020) of the adopted Dartmoor National Park Authority Partnership Plan 2021-2026. This HRA has sought to avoid duplication, be proportionate, use professional judgment, with focused in-combination screening in order to efficiently and effectively provide information for the HRA competent authority, the Dartmoor National Park Authority.

¹⁸ HRA of Final Draft Local Plan (Regulation 19) June 2019 available at <https://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/background-evidence>

3.0 HRA SCREENING

Identification of Habitats Sites & Characterisation

- 3.1 The current DNPPP 2021-2026¹⁹ was subject to HRA (HRA Report, January 2020). The findings of the independent review of Protected Site management on Dartmoor (Fursdon report, 2023)²⁰ are also noted, together with the creation of the Dartmoor Land Use Management Group²¹. Drawing upon previous HRAs and using professional judgment, Habitats sites relevant for the HRA of the emerging partnership plan were identified, as follows:

Table 3.1: Scoped Habitats Sites

Designated Site	Distance from National Park Boundary	Scoped into the PP HRA?
Dartmoor SAC	Within the National Park	Yes
South Dartmoor Woods SAC	Within the National Park	Yes
South Hams SAC	Within the National Park in part	Yes
Culm Grasslands SAC	Approximately 10.5km	No
Blackstone Point SAC	Approximately 13km	No
Plymouth Sound Estuaries SAC	Approximately 3.5km	Yes
Dawlish Warren SAC	Approximately 17km	No
Tamar Estuaries Complex SPA	Approximately 3.5km	Yes
Exe Estuary SPA	Approximately 16km	No
Exe Estuary Ramsar	Approximately 16km	No

- 3.2 The characterisations of European & Habitats sites are detailed in Appendix I. It is considered that the scoped sites are relevant for screening assessment of the review of the DNPPP through the HRA process. The **Culm Grasslands SAC** is located to the north of the National Park and is comprised of individual blocks located across North Devon. The meadows with moor grass *Molinia* species are present due to human activity and contain extremely diverse examples of wet heaths. It is the most important site for the Marsh Fritillary in the south-west. It is considered that any activities arising from the aspirational outcomes of the partnership plan would not lead to likely significant effects (LSEs) as the site is approximately 10 km distance and there are no relevant environmental impact pathways identified.
- 3.3 The **Blackstone SAC** comprises sea cliffs, shingle beach and islets – it is over 10 km distant from the National Park boundary and therefore environmental pathways are unlikely. The site would be sensitive to loss/fragmentation of habitat, but it is considered that any activities arising from the aspirational

¹⁹ <https://www.dartmoor.gov.uk/living-and-working/partnership-plan>

²⁰ <https://www.gov.uk/government/publications/independent-review-of-protected-site-management-on-dartmoor/independent-review-of-protected-site-management-on-dartmoor>

²¹ <https://www.dlumg.org.uk/about-us>

outcomes of the partnership plan would not lead to likely significant effects (LSEs).

- 3.4 The **Dawlish Warren SAC** is situated at the mouth of the Exe Estuary; it comprises a large sand-spit with a dune system and a wide variety of habitats including sand dunes, dune grassland, dune slacks and heath. It would be vulnerable to air pollution, increased recreational disturbance, and loss or fragmentation; the site is not vulnerable to water-related changes. It is considered that any activities arising from the aspirational outcomes of the partnership plan would not lead to likely significant effects (LSEs) as the site is approximately 17 km distance and no relevant environmental impact pathways were identified.
- 3.5 The **Exe Estuary SPA/Ramsar** is designated for populations of Avocet and Slavonian Grebe as well as being a wetland supporting over 20,000 waterfowl. The site is vulnerable to air quality changes, noise and light pollution, increased recreational disturbance, and loss or fragmentation of habitats. It is considered that any activities arising from the aspirational outcomes of the partnership plan would not lead to likely significant effects (LSEs) as the site is approximately 16 km distance and no relevant environmental pathways were identified. The site is within the same water catchment as the National Park and activities arising from the partnership plan could affect water quality or changes in hydraulic conditions. However, it is considered that with the Park boundary approximately 16 km distance, any activities arising from the partnership plan are not likely to be significant when taking into account the distances.
- 3.6 The **Dartmoor SAC** is the largest designated site in the National Park and consists of three separate blocks of upland with a diverse range of habitats contained within the site. The SAC is largely dependent on long-established farming techniques which have helped form the ecological character of the site; it is the southernmost blanket bog in Europe. The qualifying features include wet and dry heaths, blanket bogs, and old sessile oak woods; the rivers and streams contain populations of Otter and Atlantic Salmon. The site is vulnerable to human disturbances and grazing, and air and water pollution and changes to hydraulic conditions. The dry heaths and blanket bogs are also sensitive to erosion and changes in land management.
- 3.7 The **South Dartmoor Woods SAC** is located in the east of the National Park and is largely comprised of old sessile oak woods that support nationally important assemblages of lower plants that are unique in Western Europe. The site is a popular recreational area. The woodland is part of a complex mosaic that includes heathland and species associated with open ground, such as the nationally rare high brown fritillary and pearl-bordered fritillary butterfly. Secondary birch has also developed with bracken on the sites of old field systems, where there is active regeneration of oak. Old sessile oak woods are the primary reason for designation, and dry heaths are also a qualifying feature. The site is vulnerable to air pollution, recreational disturbance, and grazing levels.

- 3.8 The **South Hams SAC** is partially located within the National Park boundary, with the rest of the site located to the south east of Dartmoor, on the Devon coastline. This SAC is thought to hold the largest population of greater horseshoe bats in the UK with both maternity and hibernation sites and is the only one containing more than 1,000 adult bats. It contains the largest known maternity roost in the UK and possibly Europe. Many of the roosts are within caves not open to the public. The SAC is important for its extensive limestone grassland. The limestone headland cliffs of Torbay support calcareous grassland and scrubland facies. The site is exceptional in that it supports a number of rare and scarce vascular plants.
- 3.9 Within the National Park boundary there are 3 bat roosts (on the south-eastern edge of Dartmoor), with associated flightpaths and sustenance zones. The unlit countryside of the moor is beneficial for the bats who use the landscape's linear features for navigation purposes. The greater horseshoe bats are vulnerable to air pollution, changes to hydraulic conditions, recreational and urbanisation disturbance (including noise and light), and modification of cultivation practices.
- 3.10 The South Hams SAC has been highlighted as a particularly sensitive area for the Greater Horseshoe Bat. Initial guidance was published in 2010²² by Natural England for the SAC to protect the flight paths and foraging areas of the bats and aid the conservation of the species. Studies have been ongoing and Natural England published updated conservation objectives for the SAC in November 2018 and provided Supplementary Advice in March 2019²³. Population targets for both maternity and hibernation attributes for greater horseshoe bat have been updated, the use of transitional roosts has been recognised and reference to swarming activity has been removed, a 'supporting off-site (foraging areas)' attribute has been added and text has been amended to acknowledge the use of buildings for hibernation. The local authorities forming the South Hams SAC Steering Group (Devon CC, Teignbridge DC, South Hams DC, Torbay Council, DNPA and Natural England) have formally agreed HRA Guidance with respect to Greater Horseshoe Bats (October 2019)²⁴ to guide plan-making and planning applications. This guidance updates and replaces the previous guidance published by Natural England in 2010. The Consultation Zones (Sustenance Zones and Landscape Connectivity Zone are also shown on the Devon CC Environment Viewer.
- 3.11 The **Plymouth Sound & Estuaries SAC** is located on the south coast of England and straddles the border between Devon and Cornwall. Plymouth Sound and its associated tributaries comprises a complex site of marine inlets that are of international marine conservation importance because of their wide variety of salinity conditions and sedimentary and reef habitats. The high diversity of habitats and conditions gives rise to communities both representative of ria systems and some very unusual features. There are extensive and important areas of saltmarsh present, particularly on the Lynher Estuary, with natural transitions to reedbed and fringing woodland. Saltmarsh is an uncommon

²² Natural England (2010) South Hams SAC- Greater Horseshoe Bat Consultation Zone Planning Guidance

²³ <http://publications.naturalengland.org.uk/publication/6279422093033472>

²⁴ <https://www.devon.gov.uk/planning/planning-policies/other-county-policy-and-guidance/south-hams-sac-guidance/>; <https://www.devon.gov.uk/environment/wildlife/wildlife-and-geology-planning-guidance>

habitat in the south west and provides important roosting areas for birds. The habitats are vulnerable to urbanisation, pollution to groundwater and changes to hydraulic conditions, and recreational disturbance.

- 3.12 The **Tamar Estuaries Complex SPA** is a large marine inlet on the English Channel coast comprising the estuaries of the rivers Tamar, Lynher and Tavy which collectively drain an extensive part of Devon and Cornwall. The Tamar river and its tributaries provide the main input of fresh water into the estuary complex and form a ria (drowned river valley) with Plymouth lying on the eastern shore. The broader lower reaches of the rivers form extensive tidal mudflats bordered by saltmarsh communities. The mudflats contain extensive and varied communities rich in bivalves and other invertebrates and feeding grounds for water birds in numbers of European importance. Saltmarshes provide important feeding and roosting areas for large numbers of wintering water birds. The habitats of the qualifying features (Little Egret & Avocet) are vulnerable to urbanisation, pollution to groundwater, and recreational disturbance.
- 3.13 Across the relevant Habitats sites, including sites within and outside the boundary of the National Park, there are several common vulnerabilities and threats that have been highlighted through the characterisation process, as follows:
- Recreational disturbance, including noise and light
 - Pollution - groundwater, air
 - Hydrological changes – water flow/quantity, and water quality
 - Urbanisation, industrial and development activities
 - Changes in cultivation practices
 - Loss or fragmentation of habitats, including supporting habitats

Other Plans & Projects

- 3.14 The plans and projects review found that several plans have the potential for a range of in-combination effects with the DNPPP – particularly Local Plans in the area surrounding Dartmoor that are proposing new housing and employment development, as follows:

Table 3.2: Plans that could cause in-combination effects

Local Plans	Relevant Protected Sites
North Devon & Torridge Local Plan to 2031 (adopted Oct 2018) New Local Plan preparation commenced June 2026 under new gateway arrangements	Dartmoor SAC
Mid Devon Local Plan to 2033 (adopted 2020)	Dartmoor SAC

Local Plans	Relevant Protected Sites
New Local Plan preparation commenced May 2026 under new gateway arrangements	
Teignbridge Local Plan 2020-2040 (adopted 2026) New Local Plan 2029-2044 preparation commenced June 2026 under new gateway arrangements	Dartmoor SAC South Dartmoor Woods SAC South Hams SAC
Torbay Local Plan 2025 to 2045 (at Regulation 19 stage)	South Hams SAC
East Devon Local Plan to 2030 (at examination stage) And The Exeter Plan 2021-2041 (at examination stage)	Dartmoor SAC South Dartmoor Woods SAC South Hams SAC Culm Grasslands SAC Dawlish Warren SAC Exe Estuary SPA & Ramsar
The Plymouth Plan 2014-2034 (Plymouth City Council, South Hams DC, West Devon BC) (JLP adopted 2019) The Plymouth Local Plan preparation commenced June 2026 under new gateway arrangements South Hams & West Devon Joint Local Plan (for their areas outside the Dartmoor National Park) preparation commenced October 2026 under new gateway arrangements	Dartmoor SAC South Dartmoor Woods SAC South Hams SAC Blackstone Point SAC Plymouth Sound & Estuaries SAC Tamar Estuaries SPA

3.15 As well as the surrounding Local Plans, the review identified that there is the potential for in-combination effects with the Devon & Torbay Local Transport Plan 2025-2040, the Devon Minerals Plan 2011-2033, and the Devon Waste Plan to 2031, which all have the potential to increase atmospheric pollution, result in the loss or fragmentation of key habitats, and cause disturbance, including through an increase in noise and light pollution. Water management planning could have in-combination effects for water quality and water levels/hydrological changes with the South West Water Resources Management Plan (Draft 2024)²⁵, and the Environment Agency's Catchment Flood Management Plans (North, South & East Devon) and Catchment Plans²⁶. There are five National Landscapes²⁷ in Devon. Three are wholly within Devon county (North Devon Coasts, East Devon and South Devon) and two (Tamar Valley and Blackdown Hills) are cross-boundary with neighbouring authorities. Partnerships now manage water, landscape and habitats with a Catchment

²⁵ <https://www.southwestwater.co.uk/about-us/what-we-do/engineering-projects/drinking-water/water-resources-management-plan>

²⁶ <https://environment.data.gov.uk/catchment-planning/v/c3-plan/ManagementCatchment/>

²⁷ <https://www.devon.gov.uk/environment/landscape/national-and-unesco-designations>

Based Approach (CaBA²⁸). There is the potential for in-combination effects. It may be noted that these plans are also subject to HRA and SA/SEA. The Devon Carbon Plan²⁹ (2022) is the roadmap for how Devon will reach net-zero emissions by 2050 at the latest.

- 3.16 Taking into account the detailed HRA screening and appropriate assessment through the preparation of the Dartmoor Local Plan, the HRA screening of the current DNP Partnership Plan (2021-2026), and the discussions arising through preparation of the new PP, the key issues for potential in-combination effects with other plans were identified to be:

- disturbance and loss/fragmentation of habitat due to recreational activities
- flood risk management & climate change resilience and use of farmland

This HRA has sought to retain a proportionate approach relevant to a strategic level Partnership Plan that has close links with the Dartmoor Local Plan for delivery of its' bold aspirations.

Possible Effects from Partnership Plan Activities

- 3.17 A summary of the types of effects and impacts that could arise from activities in the DNPPP are set out in Table 3.3, as follows:

Table 3.3: Possible Effects & Impacts on Habitats Sites

Effects on Habitats Sites	Impact Types
Habitat & species fragmentation & loss	Direct land take or land use change – farming/grazing, forestry/woodlands Removal of green/connecting corridors supporting habitat Changes to sediment patterns (rivers and coastal areas) Loss/erosion of soil, change in quality (visitors, change in use – farming/grazing, forestry) Introduction of invasive species (predation)
Disturbance	Increased recreational activity (population increase) Noise and light pollution (from development, change and/or increased use/activities, and increased traffic)
Changes to hydrological regime/water levels	Increased abstraction levels (new development or changes to farming/forestry) Increased hard standing non-permeable surfaces/accelerated run-off Laying pipes/cables (surface & ground)

²⁸ <https://catchmentbasedapproach.org/>

²⁹ <https://devonclimateemergency.org.uk/devon-carbon-plan/>

Effects on Habitats Sites	Impact Types
	Topography alteration, including changes to a more natural flood management Changes in land use, including farming/grazing, rewilding & new woodland planting Loss of soils (new development, activities on greenfield land)
Changes to water quality	Increase in run-off/pollutants from non-permeable surfaces (roads, built areas) & agricultural/forestry practices, including use of fertilisers & emissions from vehicles – increasing issues for nitrogen neutrality ³⁰ Increased air pollution (traffic, housing) Changes to volume of discharges (consented)
Changes in air quality	Increased traffic movements Changes to air pollution, including acid deposition, nitrogen dioxide, ozone, particulates Increased/changed emissions from buildings

3.18 Appendix I details for each relevant Habitats site:

- The qualifying features
- The conservation objectives
- Any vulnerabilities including existing pressures and trends

Considering these characteristics, and the possible effects from the Partnership Plan activities, potential impact pathways were identified for each relevant Habitats site, as follows:

Table 3.4: Potential Impact Pathways

Designated Site	Air Quality	Water Quality	Hydrology	Land Use Change	Recreational Pressure	Species Disturbance
Dartmoor SAC	√	√	√	√	√	?
South Dartmoor Woods SAC	√	0	0	?	√	?
South Hams SAC	0	0	0	√	√	√
Plymouth Sound Estuaries SAC	0	?	?	?	√	0
Tamar Estuaries Complex SPA	0	?	?	?	√	0

³⁰ For example, in the Solent Estuary – see Natural England Advice for LPAs version 2 June 2019 available at <http://www.newforest.gov.uk/media/39460/Advice-on-achieving-nutrient-neutrality-for-new-development-in-the-Solent-region/Pdf/SolentNutrientAdviceV2June2019.pdf>

Key:

√	Potential environmental impact pathway identified
0	No environmental impact pathway identified
?	Uncertainty of any relevant impact pathway

Screening Assessment of Partnership Plan Themes

- 3.19 HRA screening assessment considers those elements of a plan that could have impacts and potential effects where potential environmental impact pathways have been identified and in the light of the environmental conditions necessary to maintain site integrity for the European & Habitats sites scoped into the assessment.
- 3.20 It was considered that the draft Outcomes proposed for the seven Themes (2 cross-cutting & 5 topic specific) in the Partnership Plan comprise the essence of the Plan for delivery of the long-term Vision to 2045. The proposed Outcomes in each Theme are the strategic aspirations for activities and actions that could have effects on Habitats sites. Each Outcome is defined through draft Targets. Therefore, each Theme with Outcomes was considered for its potential for Likely Significant Effects (LSEs), as follows:

3.21

DNPPP Theme (Cross-Cutting): Climate Change Draft Outcomes

- Dartmoor's response to climate change is coordinated through strong partnership working, evidence-based decision-making and shared learning
- Dartmoor contributes towards becoming a net carbon sink by 2045 by reducing greenhouse gas emissions and delivering climate change in line with the Devon Carbon Plan, while increasing carbon sequestration through delivery of the wider Partnership Plan
- Dartmoor's landscapes, communities, businesses, cultural heritage and infrastructure are more resilient and better adapted to the impacts of climate change

- 3.22 Dartmoor faces increasing drought, flooding and wildfire risks. Overall, the draft Outcome recognises that Dartmoor's response to climate change is coordinated through strong partnership working. Outcomes for reducing emissions continue with a focus on increasing Dartmoor's carbon storage and sequestration through peatland restoration, together with increasing tree canopy and woodland planting. Aspirational outcomes for adapting to climate change include a fundamental shift in nature recovery and restoring natural hydrological systems with well managed soils for climate resilience. These climate change Outcomes have been integrated into the five specific Themes and therefore, the implications of their potential effects on Habitats

sites are addressed later in the following sections.

3.23

**DNPPP Theme (Cross-Cutting): Better for the Next Generation
Draft Outcomes**

- By 2032, children and young people have regular, inclusive opportunities to experience, enjoy and learn about Dartmoor, regardless of their background or where they live
- Young people actively shape decisions about Dartmoor, with the needs and aspirations of future generations embedded in planning, management and delivery

3.24 These draft Outcomes for the next generation also relate to the other Themes in the Partnership Plan and therefore, are addressed in the relevant Theme in the sections following.

3.25

**DNPMP Theme: Better for Nature & Natural Beauty
Draft Outcomes**

- By 2032, a nature-first approach underpins decision-making across Dartmoor, supported by a comprehensive shared evidence base for the natural environment that enables consistent monitoring, improved understanding of environmental change, and informed, landscape-scale ecological restoration and land management across the National Park
- Habitats are more connected and functioning naturally to support biodiversity, water quality, carbon storage, and climate regulation
- Priority species are recovering and thriving, with appropriate reintroductions where suitable, and overall species diversity and abundance increasing over time

- 3.26 The draft Outcomes are aspirational general statements for nature and natural beauty. They are defined and supported by clear targets and timescales that will be monitored to help ensure that intentions will be implemented and achieved. Applying a nature-first approach, increasing coordinated landscape-scale nature recovery, increasing peatland restoration, increasing river water quality and addressing wetland habitat at most risk, increasing biodiversity abundance, priority habitat in good condition and SSSI land in favourable condition – all are likely to protect and enhance the natural environment and therefore, there are no adverse LSEs indicated – alone or in-combination with other plans.
- 3.27 Increasing the proportion of Dartmoor in at least higher tier agri-environment schemes will enhance nature since protection/enhancement of biodiversity, improvements in water and soil quality, management of flood risk and adaptation to climate change are inherent in such land management practices.

3.28

**DNPPP Theme: Better for Cultural Heritage
Draft Outcomes**

- By 2032, Dartmoor has a comprehensive, accessible evidence base for its historic assets, their condition and constraints, supporting effective management, monitoring and greater public understanding and appreciation of its rich cultural heritage
- Dartmoor's historic environment is conserved, enhanced, and resilient, with priority assets protected from current and future pressures and heritage considerations embedded into land management and conservation
- Dartmoor's cultural identity, traditions and rural skills are sustained and celebrated, with increased opportunities for participation, learning and intergenerational knowledge-sharing of traditional crafts

- 3.29 The draft Outcome for a comprehensive evidence base for Dartmoor's historic assets with targets to increase assessments and projects could indicate some investigation and exposure of historic and archaeological resources that might affect Habitats sites. However, any such investigations would be temporary and be subject to other guidance and controls such that adverse LSEs are not indicated. As the process for developing research proposals and other projects, the need for any further HRA would be identified as further details are developed, including any potential locational specificity.

3.30

**DNPPP Theme: Better for Farming & Forestry
Draft Outcomes**

- Farm businesses on Dartmoor are economically viable, resilient and enabled through strong networks, knowledge-sharing, advice and collaboration
- Dartmoor's farming systems are climate resilient and adaptive, with regenerative practices widely adopted improving soil health, water management, biodiversity, carbon storage and wider ecosystem services, supported by evidence-based decision-making, monitoring and landscape-scale collaboration, that improves environmental and economic outcomes
- Strong local markets and supply chains enhance farm and woodland business resilience, supporting profitable farming, sustainable food and timber production, and a circular low-carbon economy
- Dartmoor's woodlands and woody habitats are expanded, better managed and resilient, supporting biodiversity, carbon storage, climate adaptation and ecosystem function through sustainable and collaborative land management
- Dartmoor has a shared evidence base and understanding of woodland extent, condition, habitat value and opportunities for action, enabling coordinated woodland management, nature recovery and sustainable forestry
- Dartmoor has connected farming and forestry networks that enable collaboration, knowledge sharing, skills development and coordinated support, providing clear pathways for new and next generation farmers and land managers to enter, remain and thrive

3.31 This Theme recognises the profound change for farming and forestry that arises from climate change effects, national policy with the new Environmental Land Management scheme (ELM) linked to public goods, changes to vegetation and grazing regimes, debates on protected sites and land use, and development and recreational impacts. Upland farming has shaped the special qualities of the National Park and its communities; however, the vulnerability of marginal Less Favoured Areas (LFAs) to economic pressures continues. The farming population is shrinking and ageing – this loss of cultural identity will impact culture, landscape and tourism. The Plan understands that the challenge is to ensure that future farming and forestry practices are viable and deliver the impressive array of public benefits associated with Dartmoor.

3.32 The draft Outcome for economically viable, resilient and enabled farm businesses, including through improvement of ELM schemes, promotes farming viability and resilience. At this stage, the targets do not include sufficient details to identify any adverse LSEs but these are considered to be unlikely. As ELM schemes develop and new delivery models are piloted, the need for any further HRA can be considered - particularly as any locational specificity of proposed schemes and actions are identified.

- 3.33 The draft Outcome for Dartmoor's farming systems to be climate resilient and adaptive includes inherent improvements in environmental topics including soils, water and biodiversity such that it is considered that there would be no adverse LSEs. Overall, the targeted peatland restoration to functional hydrological condition will have positive effects on habitats, including protected sites.
- 3.34 The draft Outcome for improving Dartmoor's woodlands and woody habitats supports biodiversity, carbon storage, climate adaptation and ecosystem functioning such that there would be no adverse LSEs. The targets to deliver woodland creation, woodland restoration and woody habitat enhancement using natural regeneration, where appropriate will support biodiversity, climate resilience and ecosystem functioning – it is considered that there would be no adverse LSEs. Completing the mapping of woodland condition assessments for 100% of SSSI woodland will contribute to protection of Habitats sites and enable more effective opportunities.
- 3.35 Encouraging natural woodland expansion along upland river valleys will ensure that there are no adverse LSEs on the wet and dry heaths, blanket bogs, and old sessile oak woods of the Dartmoor SAC. The rivers and streams contain populations of Otter and Atlantic Salmon and it is not considered that encouraging natural woodland expansion would have any adverse LSEs on these fish species.
- 3.36 Developing a Dartmoor-wide Pest and Invasive Species Strategy by 2028 with an action plan by 2029 will have positive effects for those Habitats sites vulnerable to invasive species – no adverse LSEs.
- 3.37 The draft Outcome for collaboration and connectivity for farming and forestry networks will enable knowledge sharing. The target for re-establishing a Dartmoor Forestry Group by 2029 will help avoid any conflicts with forestry, farming, nature recovery, heritage and access such that it is considered that there would be no adverse LSEs.

3.38

DNPPP Theme: Better for People
Draft Outcomes

- By 2032, Dartmoor is accessed and enjoyed by a diverse ranges of people, with inclusive and well-promoted volunteering and participation opportunities widely available
- Dartmoor's transport network is better connected, more reliable, and easier to use, enabling more people to access and enjoy Dartmoor sustainably
- By 2032, people enjoy Dartmoor responsibly, helping protect the National Park, while visitor management maintains a balance between accessible, well-serviced areas and wilder, quieter spaces sustaining tranquillity, biodiversity, landscape character and climate resilience

3.39 The draft DNPPP acknowledges that improving accessibility on Dartmoor continues to be a priority, including the growing need for helping to improve quality of life for those with physical and mental health needs. The draft Outcome for a diverse range of people with inclusive volunteering and participation opportunities is a targeted aspiration that is not locationally specific and therefore, it is considered that there would be no adverse LSEs.

3.40 The draft Outcome for a more sustainable connected transport network promotes increased awareness by visitors, development of integrated low-carbon visitor itineraries, improvement and pilot schemes. The continued encouragement of sustainable movement is likely to have beneficial effects for Habitats sites by reducing vehicle emissions and potential for nitrogen deposition. The need for any further HRA can be considered - particularly as any locational specificity of proposed schemes and actions are identified. At this stage, there are no adverse LSEs identified.

3.41 The draft Outcome seeking to maintain a balance between accessible, well-serviced areas and wilder quieter spaces, sustaining tranquillity, biodiversity, landscape character and climate resilience confirms the zonal approach already established. A target is proposed for implementing visitor management interventions and infrastructure improvements at 10 priority locations across Dartmoor. The need for any further HRA can be considered - particularly as any locational specificity of proposed schemes and actions are identified. At this stage, there are no adverse LSEs identified.

3.42

DNPPP Theme: Better for Business & Communities
Draft Outcomes

- By 2032, Dartmoor has resilient, collaborative businesses and communities with a strong voice, active local networks, a thriving cultural life, and a strong sense of belonging, underpinned by a well-understood local economy
- Businesses and communities across Dartmoor have reliable digital connectivity that enables effective living, working, and access to services and opportunities
- Businesses and communities across Dartmoor are supported by innovative, locally appropriate transport options that are accessible, connected and sustainable
- Dartmoor has accessible employment, strong skills pathways, training and enterprise opportunities that enable people to live and work and for businesses to thrive locally
- Businesses and communities across Dartmoor are better adapted and resilient to climate risks, with improved awareness, planning, and local capacity to respond
- By 2032, Dartmoor communities have access to innovative and appropriate housing solutions, with homes that are energy efficient, affordable to run, and meet local needs

- 3.41 The Partnership Plan recognises the needs of Dartmoor's communities and businesses that are so closely associated with the Special Qualities of the National Park, including the designated sites. Whilst the overall population for Dartmoor has been relatively stable over the last 20 years, the proportion of people over 65 is increasing with the working age population decreasing with the majority self-employed. Connectivity, access and the cost-of-living crisis contribute to change.
- 3.42 The draft Outcome for resilient, collaborative businesses and communities is a targeted aspiration that is not locationally specific and therefore, it is considered that there would be no adverse LSEs.
- 3.43 The draft Outcome for reliable digital connectivity includes targets for further baseline mapping to identify areas for improvement and establishment for digital connectivity hubs. The need for any further HRA can be considered - particularly as any locational specificity of proposed schemes and actions are identified. At this stage, there are no adverse LSEs identified.
- 3.44 The intention for sustainable transport with targets for increasing more sustainable travel choices is aspirational and without locational specificity such that there are no adverse LSEs identified. The target to increase the number of active community care hubs supporting access to local services

could affect Habitats sites but the need for any further HRA can be considered as these proposals are developed.

- 3.45 The draft Outcomes and targets on accessible employment, strong skills pathways & training, together with improved awareness, planning and local capacity to respond to climate risks are aspirational, and with no locational specificity, there are no adverse LSEs identified.
- 3.46 The draft Outcome for Dartmoor communities to have access to innovative and appropriate housing solutions with targets for affordable homes, and to meet local needs will be delivered through the review of the Dartmoor Local Plan which has recently commenced. Emerging plan policies, including those to protect Habitats sites, and proposed site allocations will be subject to HRA screening and appropriate assessment. The intentions for energy efficiency and retrofit opportunities will also be delivered through the local plan process and be subject to HRA and appropriate assessment.
- 3.47 Overall, it is considered that the draft Dartmoor National Park Partnership Plan is not likely to have any significant adverse effects on the integrity of the identified Habitats sites – alone or in-combination with other plans or projects. The Partnership Plan is an overarching plan that sets a strategic framework for development of more specific strategies, plans and actions; at this strategic stage there is insufficient information or locational specificity to assess the effects on the Habitats sites, although it is considered that there will not be any LSEs. The table following summarises the findings of the HRA screening and this is discussed further for each of the relevant environmental impact pathways and the Themes set out in the draft Partnership Plan.

Table 3.5: HRA Screening Summary

European Site	LSEs			
	Air Quality	Water	Recreation Disturbance	Habitat Loss Fragmentation
Dartmoor SAC	No	No	No	No
South Dartmoor Woods SAC	No	No	No	No
South Hams SAC	No	No	No	No
Plymouth Sound Estuaries SAC	No	No	No	No
Tamar Estuaries Complex SPA	No	No	No	No

Key:

Likely Significant Effect	Yes	Appropriate Assessment required
No Likely Significant Effect	No	No further assessment required
Significant Effect Uncertain	?	Uncertain, precautionary approach taken, and Appropriate Assessment required

Air Quality:

- 3.48 Natural England advises³¹ that usually only those Habitats sites present within 200m of the edge of a road on which a plan or project will generate traffic will need to be considered when checking for LSEs from road traffic emissions.
- 3.49 The Dartmoor SAC comprises three separate blocks of upland with a range of habitats; the heathlands, blanket bogs and oak woodlands are sensitive to atmospheric pollution. Critical loads for nitrogen are not being exceeded at the site³². The A386 runs to the western boundary of the Dartmoor SAC in the north-western area of the National Park. However, the boundary is approximately at least 300m distance at the nearest points. The southernmost boundary of this part of the SAC is adjacent to the B3212 for only about 150m. The northern boundary of the central smaller element of the Dartmoor SAC is about 500m south of a small lane that is not a thoroughfare and reverts to a track. For the other element of the Dartmoor SAC to the south, there are only local roads that are not thoroughfares and tend to revert to tracks around the designated area; none are within 200m.
- 3.50 The South Dartmoor Woods SAC is composed of three areas of woodland adjacent to the northeast of the southern area of the Dartmoor SAC and to the north of Buckfastleigh. Critical loads for nitrogen are not being exceeded at the site³³. There are various minor roads and trackways that are within 200m in some places. There is also a smaller area of woodland at Shaugh Prior in the southwest of the DNPA area and this is adjacent to a minor road for a short distance. The oak woods and the dry heath habitats are vulnerable to air pollution.
- 3.51 The Greater Horseshoe Bat is the primary reason for designation of the South Hams SAC which (apart from the coast some 25 km away) is located in caves in Buckfastleigh some 100m from the A384. There are also several sites in the Haytor and Smallacombe Iron Mines area of the SAC. Air pollution and nitrogen deposition is listed as a vulnerability for the Greater Horseshoe Bat. Critical loads for nitrogen are being exceeded for broadleaved deciduous woodland (supporting habitat for Greater Horseshoe Bats)³⁴; also, for dry heaths and Quercus woodland habitats.
- 3.52 The intentions for the Partnership Plan include more sustainable and focused access according to the type of activities, and more sustainable travel – both of these intentions should contribute to reducing vehicle emissions and reduced vulnerabilities for the SACs. It may be necessary to consider HRA screening again for any strategies or plans that are developed, for example, for heavily used recreational sites on the moorland, and for any projects that

³¹ NE Internal Guidance – Approach to advising competent authorities on Road Traffic Emissions and HRAs (June 2018)

³² Air Pollution Information System Site Relevant Critical Loads (2014-16) <http://www.apis.ac.uk/> [Accessed September 2018]

³³ *ibid*

³⁴ Air Pollution Information System Site Relevant Critical Loads (2014-16) <http://www.apis.ac.uk/> [Accessed September 2018]

might affect the bats and the South Hams SAC (although planning guidance exists to avoid any LSEs).

Recreational Disturbance:

- 3.53 The Plymouth Sound & Estuaries SAC comprises a complex area of marine inlets for the large bay of the Sound itself and its tributaries that are ria systems with extensive waters, sandbanks, mudflats, and salt meadows important for a high diversity of habitats and species. Saltmarsh provides an important roosting area for birds. The SAC is vulnerable to pollution; nitrogen critical loads are not being exceeded³⁵.
- 3.54 The Tamar Estuaries SPA is a large marine system comprising the estuaries of the rivers Tamar, Lynher, and Tavy that collectively drain an extensive part of Devon and Cornwall. The mudflats and saltmarshes contain extensive varied communities that provide important feeding and roosting areas for large numbers of wintering waterbirds. The qualifying features of the SPA are the Little Egret and the Avocet, and vulnerabilities include pollution.
- 3.55 The nearest boundary of the National Park is some 3.5 km away from the nearest part of the designated SAC/SPA area. The Yelverton area in the south-west of the National Park was identified through studies for the Plymouth & South West Joint Local Plan (PSWJLP)³⁶ as falling within some of the zones of influences identified in scenario testing within which development may be considered to have a likely significant impact for recreational disturbance on the SAC/SPA. This issue resolved through a Statement of Common Ground between Natural England, the Plymouth & South West Joint Plan authorities, and the Dartmoor National Park Authority in respect of the Local Plan. The draft Partnership Plan is not proposing any development in itself; certain delivery mechanisms will be through the Local Plan (review recently commenced) and subject to policies that avoid adverse effects on Habitats sites and require biodiversity net gain. The draft new Local Plan will be subject to HRA screening an appropriate assessment in due course.
- 3.56 The Annex I key features of the Dartmoor SAC are wet and dry heaths, blanket bogs and old oak woods and the site is sensitive to disturbance from recreational activities. The key features of the South Dartmoor Woods SAC include old oak woods and dry heath which are sensitive to disturbance from recreational activities. Studies (SWEEP, 2018)³⁷ have focused on the recreational impacts relevant to these habitats of Dartmoor and confirm that population growth in the region around Dartmoor will result in significant increases in recreational use with impacts for wildlife and people.

³⁵ ibid

³⁶ SWJLP adopted 2019

<https://www.plymouth.gov.uk/planningandbuildingcontrol/plymouthandsouthwestdevonjointlocalplan>

³⁷ SWEEP for DNPA (August 2018) Population Futures & Dartmoor National Park Implications of development around the outskirts of Dartmoor for recreational use and management of access; available at: <https://sweep.ac.uk/population-futures/sweep-dnpa-dartmoor-recreation-futures-extended-summary/>

- 3.57 The SWEEP Report advises: *"For those new residents of the region, Dartmoor offers a significant resource that will likely be the source of substantial economic welfare and also the backdrop that encourages significant physical activity. Of course, that activity will also have impacts on the National Park and drawing on best available evidence the report identifies the possible extent of increased erosion along Dartmoor's paths network and the species and locations most vulnerable to disturbance as a result of increasing recreational pressure"*. It identifies those areas that might be a focus of concern and the locations in which they are made vulnerable by rising recreation pressures, as follows: the areas around Burrator, the Dart Valley and Venford Reservoir, Haytor, Warren House, Soussons and Fernworthy.
- 3.58 The SWEEP Report identifies 12 species that stand as examples of species that might be vulnerable to disturbance from increased intensity of recreational activity. For these 12 listed species, 4 are relevant for the Dartmoor SAC: the Greater Horseshoe Bat as an Annex II species is the primary reason for the designation of the site; Southern Damselfly is also listed as an Annex II species; the Atlantic Salmon and Otter are listed as qualifying features (details in Appendix I of this report).
- 3.59 The sensitivity of the Greater Horseshoe Bat to recreational impacts is identified as high and likely³⁸. For the Southern Damselfly and the Atlantic Salmon, the sensitivities are considered to have possible, minor impacts from recreational activities; recreational impacts for the Otter were determined as unlikely for this species.
- 3.60 Appendix 4 of the SWEEP Report details information on Greater Horseshoe Bats - they can be found roosting in caves, mines, old slate-roofed barns and buildings. Their foraging and commuting requirements include linear features, woodland edges, hedgerows, meadows and cattle-crazed habitats. They feed on a range of insects such as moths, dung beetles and craneflies. Impacts are likely from cars on the road and activities such as caving; other activities such as walking are unlikely to cause issues unless close to roosts or at night with torches. Other threats arise through increases in night-time lighting, for example during large events or through changes in infrastructure and street-lighting and can cause severe detrimental effects by impacting bat commuting routes. Land-use change resulting in losses of foraging sites and commuting routes is a threat - loss of meadows, pastures and grazed areas could have negative effects by causing a reduction in important invertebrate prey species.
- 3.61 Whilst studies undertaken for the DNPA have indicated significant impacts from the increased recreational access associated with the major new development planned around the National Park, Natural England had disagreed with the concern raised for potential in-combination effects with the Plymouth Plan (SWJLP, adopted 2019). NE had advised that recreational impacts are not identified as a pressure or threat for the Dartmoor or South Dartmoor Woods SACs. However, it is noted that recreational disturbance was

³⁸ Ibid Table 12, page 65

considered by the HRA and appropriate assessment for the SWJLP. It is assumed that the policies in the SWJLP were considered sufficient to protect in-combination effects. It may also now be noted that a new local plan³⁹ for Plymouth is being prepared and this will be subject to HRA screening and appropriate assessment in due course. The focus of the DNPPP is on welcoming and managing the visitors who do come and accepting that numbers will increase given the growth in surrounding areas and predictions in the SWEEP report – rather than positively seeking to attract new visitors.

Water Levels & Water Quality

- 3.62 The Habitats sites outside of the DNPA area are vulnerable to changes in the water environment but environmental pathways and significant effects are unlikely for reasons, as follows:
- Plymouth Sound & Estuaries SAC some 3.5 km away from nearest DNP boundary
 - Tamar Estuaries SPA is a large marine area comprising three estuaries and at least 3.5km from the DNP boundary
 - Exe Estuary SPA/Ramsar is some 16 km away
- 3.63 It is understood that distance is not a factor when considering changes to water quality and the hydrological regime. The Dartmoor Local Plan recognises that Dartmoor hosts the headwaters of 9 main river catchments, is the principal source of drinking water for much of Devon, and its deep peat, soils and woodlands are important stores of carbon. The Partnership Plan proposes nature recovery at a landscape scale by the restoration of natural processes – including rivers and streams, wetland habitats, and the hydrological functions of degraded blanket bogs. Whilst it seems unlikely that proposals from the Plan would be of sufficient scale and proximity to adversely affect the estuarial SACs/SPAs (and the objectives of the DNPPP are more likely to have positive effects), as any specific plans or projects are developed, the need for further HRA may be considered.

Habitat Loss and Fragmentation

- 3.64 For the Habitats sites outside of the DNPA area, there will be no loss or fragmentation of habitats as there is no land take proposed through the Partnership Plan, and therefore, no LSEs alone or in-combination with other plans.
- 3.65 There are potential conflicts between expanding Dartmoor's woodlands and other outcomes including landscape character and cultural heritage. Ancient and semi-natural woodlands are considered of greater value for cultural heritage and wildlife, whereas conifer plantations are more economically valuable and have the capacity to absorb greater numbers of visitors, including more active recreation such as mountain biking. The SACs

³⁹ <https://www.plymouth.gov.uk/local-plan>

are not designated for conifer trees and the intentions will not have any adverse LSEs. The mapping of woodland extent, condition and habitat type will guide opportunities for action and including the need for any further HRA for any specific projects identified and progressed.

- 3.66 The Partnership Plan recognises the importance of a grazed landscape with the need for farming to be viable, and the interactions with other objectives including cultural heritage and regenerative practices for soil, water, carbon storage, biodiversity and wider ecosystem services. The proposed targets such as that for the improvement of ELM schemes help ensure that there will not be any adverse LSEs.
- 3.67 A challenge is that Dartmoor is predicted to continue to attract more visitors, particularly with the large number of houses being built in surrounding areas. The DNPA also seeks to improve accessibility enjoyed by a diverse range of people. However, the DNPA seeks to proactively manage visitors through strategic zoning and encouraging more sustainable transport. As any specific projects or plans are developed, the implications for the Habitats sites will be addressed, including the need for any further HRA.

Further Assessment Needed?

- 3.68 The HRA screening assessment for the draft Dartmoor Partnership Plan 2027-2032 identified that there will be no likely significant adverse effects – alone or in-combination with other plans or projects. Therefore, no further assessment is required at this stage of plan-making. The HRA considered the strategic nature of the Plan and identified some elements where the need for further HRA may need to be considered again as specific strategies or plans are developed.

4.0 HRA SUMMARY & NEXT STEPS

Summary

- 4.1 This report presents the methods used and the findings arising from the HRA Screening of the draft Dartmoor Partnership Plan. The HRA has been undertaken in accordance with extant guidance, good practice and taken into account the implications of imminent proposed changes to HRA guidance. Three European sites within the Dartmoor National Park boundary and two estuarial sites outside the National Park were considered within the HRA screening.
- 4.2 The HRA screening identified that due to the strategic nature of the Partnership Plan, and the limited potential environmental pathways for impacts to the Habitats sites outside of the National Park, there were no identified adverse Likely Significant Effects (LSEs) for air quality changes, recreational disturbance, changes to water quality or levels, or habitat loss/fragmentation – alone or in-combination with other plans, specifically the Plymouth Plan.
- 4.3 Overall, it is considered that the draft Dartmoor National Park Partnership Plan is not likely to have any significant adverse effects on the integrity of the identified Habitats sites – alone or in-combination with other plans or projects. The Partnership Plan is an overarching plan that sets a strategic framework for development of more specific strategies, plans and actions; at this strategic stage there is insufficient information or locational specificity to assess the effects on the Habitats sites. As specific projects or plans are developed, there may be a need to consider further HRA.

Next Steps

- 4.4 The HRA Regulations require that the competent authority should carry out formal consultation with the environmental bodies, in this case Natural England and the Environment Agency. Any comments received on this HRA Report will be taken into consideration in the finalisation and adoption of the Dartmoor National Park Partnership Plan.

APPENDIX 1: HABITATS SITE CHARACTERISATIONS

Dartmoor Partnership Plan 2027-2032

HRA Report: Habitats Site Characterisations

European sites within Dartmoor National Park

Site Name: Dartmoor Grid Reference: SX590864 JNCC Site Code: UK0012929 Size: 23158.64ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
Site Description	The site is the largest designated site in the National Park, and consists of three separate blocks of upland with a diverse range of habitats contained within the site. The site is largely dependent on long-established farming techniques which have helped form the ecological character of the SAC. The SAC is also the southernmost blanket bog in Europe. The bogs are dominated by purple moor-grass, with the areas of the bog that are very wet supporting widespread <i>Sphagnum</i> mosses. The SAC contains extensive areas of western gorse, with bristle bent dry heath found in lowland areas and heather-bilberry found in upland areas. There are 3 main areas of upland oak woods within the SAC, largely and the rivers and streams located within the SAC contain populations of otter and Atlantic salmon. The habitats within the SAC also support a range of invertebrate and bird species, including Southern damselfly.
Qualifying Features	Annex I habitats that are primary reason for selection of the site: ■ Northern Atlantic wet heaths with <i>Erica tetralix</i> ■ European dry heaths ■ Blanket bogs ■ Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles Annex II species that are primary reason for selection of the site: ■ Southern damselfly Qualifying features but not primary reason for site selection: ■ Atlantic Salmon ■ Otter ■
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

Site Name: Dartmoor Grid Reference: SX590864 JNCC Site Code: UK0012929 Size: 23158.64ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
	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 ▪ The distribution of qualifying species within the site
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form: ▪ Human intrusions and disturbances (including recreational activity) (Threat from inside⁴⁰) ▪ Grazing- (Threat from inside) ▪ Air pollution, air-borne pollutants- (Threat from inside & outside) ▪ Pollution to groundwater (point sources and diffuse sources)- (Threat from inside & outside) ▪ Human induced changes in hydraulic conditions- (Threat from inside & outside) Other Vulnerabilities and affected features: ▪ Wildfire/Arson- Features affected: Wet heathland and Blanket bogs ▪ Invasive Species- Features affected: European dry heath ▪ Erosion- Features affected: Blanket bogs, European dry heaths ▪ Disease- Features affected: Western acidic oak woodland ▪ Changes in Land Management- Features affected: Wet heathland, European dry heaths, Blanket bogs

⁴⁰ Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

Site Name: South Dartmoor Woods Grid Reference: SX710701 JNCC Site Code: UK0012749 Size: 2159.06ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
Site Description	The South Dartmoor Woods SAC site is located in the east of the National Park and is largely comprised of old sessile oak woods which supports nationally important assemblages of lower plants that are unique in Western Europe. The site is a popular recreational area, The woodland is part of a complex mosaic that includes heathland and species associated with open ground, such as the nationally rare high brown fritillary and pearl-bordered fritillary butterfly. Secondary birch has also developed with bracken on the sites of old field systems, where there is active regeneration of oak.
Qualifying Features	Annex I habitats that are primary reason for selection of the site: - Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles Qualifying feature but not a primary reason for site selection: - European dry heaths
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 - The structure and function (including typical species) of qualifying natural habitats - The supporting processes on which qualifying natural habitats rely
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form: - Air pollution, air-borne pollutants- (Threats from inside & outside⁴¹) Other Vulnerabilities and affected features: - Grazing levels- Features affected: Lower plants, Dry heaths - Recreational pressure- Features affected: Whole site

⁴¹ Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

Site Name: South Hams Grid Reference: SX942565 JNCC Site Code: UK0012650 Size: 126.87ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
Site Description	The South Hams SAC is partially located within the National Park boundary, with the rest of the site located to the south east of Dartmoor, on the Devon coastline. The South Hams SAC is thought to hold the largest population of Greater horseshoe bat in the UK, and is the only one containing more than 1,000 adult bats. It contains the largest known maternity roost in the UK and possibly Europe. The site contains both maternity and hibernation sites. Many of the roosts are within caves not open to the public. However, within the National Park boundary there are 3 bat roosts (on the south-eastern edge of Dartmoor), with associated flightpaths and sustenance zones. The unlit countryside of the moor is beneficial for the bats who use the landscapes linear features for navigation purposes. Guidance related to the South Hams SAC and associated bat feature has been recently updated by Natural England with supplementary advice for the conservation objectives⁴². The SAC is important for its extensive limestone grassland. The limestone headland cliffs of Torbay supports calcareous grassland and scrubland facies. The site is exceptional in that it supports a number of rare and scarce vascular plants. The SAC also supports areas of <i>Tilio-Acerion</i> ravine forest, which is woodland containing ash, elm and small leaved lime and field maple. A number of the specific habitat features of the SAC are not relevant for the areas of the SAC located within the National Park boundary. These include the vegetated sea cliffs and limestone grasslands, which are located in the SAC area on the Devon coastline. The SAC area within Dartmoor has a designation focused on the caves and associated bat roosts at Buckfastleigh and are the relevant features to consider in this HRA. Recent Supplementary Advice⁴³ from NE confirms that the landscape around the SAC sites is essential for the bats for foraging and other behaviours.
Qualifying Features	Annex I habitats that are primary reason for selection of the site: ■ European dry heaths ■ Semi-natural dry grasslands and scrubland facies on calcareous substrates Annex 1 habitats that are a qualifying feature but not primary reason for site selection

⁴² <http://publications.naturalengland.org.uk/publication/6279422093033472>

⁴³ Ibid

Site Name: South Hams Grid Reference: SX942565 JNCC Site Code: UK0012650 Size: 126.87ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
	■ Vegetated seas cliffs of the Atlantic and Baltic Coasts ■ Caves not open to the public ■ <i>Tilio-Acerion</i> forests of slopes, scree and ravines Annex II Species that are primary reason for selection of the site: ■ Greater horseshoe bat ■ <i>Updated in November 2018 & with supplementary advice in March 2019:</i> ■ Vegetated sea cliffs of the Atlantic and Baltic coasts H4030 ■ European dry heaths ■ Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco Brometalia</i>) ■ Caves not open to the public ■ <i>Tilio-Acerion</i> forests of slopes, scree and ravines; Mixed woodland on base-rich soils associated with rocky slopes (* priority habitat) ■ <i>Rhinolophus ferrumequinum</i>; Greater horseshoe bat
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 ■ The distribution of qualifying species within the site

Site Name: South Hams Grid Reference: SX942565 JNCC Site Code: UK0012650 Size: 126.87ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
	NE updated these Conservation Objectives for the South Hams SAC in November 2018 and provided Supplementary Advice in March 2019⁴⁴, key changes as follows: ■ Population targets for both maternity and hibernation attributes for greater horseshoe bat have been updated ■ the use of transitional roosts has been recognised and reference to swarming activity has been removed ■ a 'Supporting off-site (foraging areas)' attribute has been added ■ and text has been amended to acknowledge the use of buildings for hibernation.
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form: ■ Other urbanisation, industrial and similar activities- (Threats from inside & outside⁴⁵) ■ Human induced changed in hydraulic conditions- (Threats from inside & outside) ■ Outdoor sports and leisure activities, recreational activities- (Threats from inside & outside) ■ Modification of cultivation practices- (Threats from inside & outside) ■ Biocenotic evolution, succession- (Threats from inside & outside) Other Vulnerabilities and affected features: ■ Physical modification- Features affected: Greater horseshoe bat ■ Air pollution, risk of atmospheric nitrogen deposition- Features affected: Greater horseshoe bat

⁴⁴ <http://publications.naturalengland.org.uk/publication/6279422093033472>

⁴⁵ Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

European sites outside of the Dartmoor National Park boundary

Site Name: Culm Grasslands Grid Reference: SS843214 JNCC Site Code: UK0012679 Size: 774.21ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
Site Description	The Culm Grasslands SAC is located to the north of the National Park, and is comprised of individual blocks located across North Devon. The Culm Grasslands SAC represents <i>Molinia</i> meadows in south-west England, and is present as a result of human activity. This site contains extremely diverse examples of the heathy type of fen-meadow, ranging from short, grazed swards through to stands that are transitional to scrub. The structural diversity accounts for the conservation of a wide range of flora and fauna, particularly of species characteristic of south-western Europe, such as meadow thistle. The Culm Grasslands SAC also contains the largest cluster of sites for Marsh fritillary in the south-west peninsula. It is judged to be the most important location for the species in its major south-west stronghold.
Qualifying Features	Annex I habitats that are primary reason for selection of the site: ▪ <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils ▪ Northern Atlantic wet heaths with <i>Erica tetralix</i> Annex I habitats that are a qualifying feature but not primary reason for site selection ▪ Northern Atlantic wet heaths with <i>Erica tetralix</i> Annex II species that are primary reason for selection of the site: ▪ Marsh fritillary butterfly
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 ▪ The distribution of qualifying species within the site

Site Name: Culm Grasslands Grid Reference: SS843214 JNCC Site Code: UK0012679 Size: 774.21ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form: ■ Human induced changed in hydraulic conditions- (Threats from inside & outside⁴⁶) ■ Modification of cultivation practices- (Threats from inside) ■ Changes in biotic conditions- (Threats from inside & outside) ■ Air pollution, air-borne pollutants- (Threats from inside & outside) ■ Cultivation- (Threats from inside) Other Vulnerabilities and affected features: ■ Hydrological changes- Features affected: Marsh fritillary butterfly ■ Invasive species- Features affected: Marsh fritillary butterfly

⁴⁶ Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

Site Name: Blackstone Point Grid Reference: SX535462 JNCC Site Code: UK0030091 Size: 7.81ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
Site Description	Blackstone Point SAC consists of sea cliffs, shingle beach and islets, and supports one of the largest concentrations of shore dock on rocky sea-cliffs in south-west England. In 1999 there were five discrete colonies totaling at least 29 plants.
Qualifying Features	Annex II species that are primary reason for selection of the site: Shore dock <i>Rumex rupestris</i>
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 qualifying species rely - The populations of qualifying species - The distribution of qualifying species within the site
Vulnerabilities (includes existing pressures and trends)	None listed

Site Name: Plymouth Sound & Estuaries Grid Reference: SX472506 JNCC Site Code: UK0013111 Size: 6386.95ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
Site Description	Plymouth Sound and Estuaries SAC is located on the south coast of England and straddles the border between Devon and Cornwall. Plymouth Sound and its associated tributaries comprises a complex site of marine inlets. The ria systems entering Plymouth Sound (St John's Lake and parts of the Tavy, Tamar and Lynher), the large bay of the Sound itself, Wembury Bay, and the ria of the River Yealm are of international marine conservation importance because of their wide variety of salinity conditions and sedimentary and reef habitats. The extensive mudflats present throughout the SAC are a highly productive system, forming a critical part of the food chain. The high diversity of habitats and conditions gives rise to communities both representative of ria systems and some very unusual features, including abundant southern Mediterranean-Atlantic species rarely found in Britain. There are extensive and important areas of saltmarsh present, particularly on the Lynher Estuary, with natural transitions to reedbed and fringing woodland. Saltmarsh is an uncommon habitat in the south west and provides important roosting areas for birds. The reef communities which are located in the SAC are important due to the number of species present, with the Devonian limestone reef of particular importance as this is one of only two sites in the south west with coastal Devonian limestone. Intertidal reefs with rockpools at Wembury, Penlee, Hooe Lake Point and the mouth of the Yealm support a nationally uncommon sponge, seasquirt and red algae community.
Qualifying Features	Annex I habitats that are primary reason for selection of the site: ■ Sandbanks which are slightly covered by sea water all the time ■ Estuaries ■ Large shallow inlets and bays ■ Reefs ■ Atlantic salt meadows ■ Mudflats and sandflats not covered by seawater at low tide Annex I habitats that are a qualifying feature but not primary reason for site selection: ■ Mudflats and sandflats not covered by seawater at low tide

Site Name: Plymouth Sound & Estuaries Grid Reference: SX472506 JNCC Site Code: UK0013111 Size: 6386.95ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
	Annex II species that are primary reason for selection of the site: ▪ Shore dock <i>Rumex rupestris</i> Annex II species that are a qualifying feature but not primary reason for site selection: ▪ Allis shad <i>Alosa alosa</i>
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.
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form: ▪ Other urbanisation, industrial and similar activities- (Threats from inside & outside⁴⁷) ▪ Pollution to groundwater (point sources and diffuse sources)- (Threats from inside & outside) ▪ Human induced change in hydraulic conditions- (Threats from inside & outside) ▪ Outdoor sports and leisure activities, recreational activities- (Threats from inside and outside) ▪ Changes in abiotic conditions- (Threats from inside & outside) Other Vulnerabilities and affected features: ▪ Inappropriate weirs, dams and other structures- Features affected: Allis shad ▪ Fisheries- Features affected: Reefs, subtidal sandflats, shallow inlets and bays

⁴⁷ Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

Site Name: Dawlish Warren Grid Reference: SX984792 JNCC Site Code: UK0030130 Size: 58.69ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
Site Description	Dawlish Warren SAC is located to the east of Dartmoor National park, and is situated at the mouth of the Exe Estuary. The SAC is a large sand-spit with a dune system, and contains a wide variety of habitats including sand dunes, dune grassland, dune slacks and heath. The flora includes several plants of local distribution. Short-sward grassland on the warren supports the only mainland British population of the sand crocus <i>Romulea columnae</i>. Large populations of petalwort occur in two dune slacks.
Qualifying Features	Annex I Habitats that are primary reason for selection of the site: ▪ Humid dune slacks Annex I habitats that are a qualifying feature but not primary reason for site selection: ▪ White dunes ▪ Grey dunes Annex II Species that are primary reason for selection of the site: ▪ Petalwort, <i>Petalophyllum ralfsii</i>
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.
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form:

Site Name: Dawlish Warren Grid Reference: SX984792 JNCC Site Code: UK0030130 Size: 58.69ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
	▪ Modification of cultivation practices- (Threats from inside⁴⁸) ▪ Outdoor sports and leisure activities, recreational activities- (Threats from inside) ▪ Changes in biotic conditions- (Threats from inside and outside) ▪ Changes in abiotic conditions- (Threats from inside and outside)

⁴⁸ Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

Site Name: Tamar Estuaries Complex Grid Reference: SX472506 JNCC Site Code: UK9010141 Size: 1995ha Designation: SPA	Habitats Regulations Assessment: Data Proforma
Site Description	The Tamar Estuary lies on the border between Devon and Cornwall on the southern coast of England. The estuary system is a large marine inlet on the English Channel coast comprising the estuaries of the rivers Tamar, Lynher and Tavy which collectively drain an extensive part of Devon and Cornwall. The Tamar river and its tributaries provide the main input of fresh water into the estuary complex, and form a ria (drowned river valley) with Plymouth lying on the eastern shore. The broader lower reaches of the rivers form extensive tidal mud-flats bordered by saltmarsh communities. The mud-flats contain extensive and varied communities rich in bivalves and other invertebrates and feeding grounds for waterbirds in numbers of European importance. Saltmarshes provide important feeding and roosting areas for large numbers of wintering waterbirds.
Qualifying Features	▪ Little egret <i>Egretta garzetta</i>- Non-breeding. 72 individuals representing at least 9.0% of the population in Great Britain (Count as at 1993) ▪ Avocet <i>Recurvirostra avosetta</i>, 201 individuals representing at least 15.8% of the wintering population in Great Britain
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; ▪ The extent and distribution of the habitats of the qualifying features ▪ The structure and function of the habitats of the qualifying features ▪ The supporting processes on which the habitats of the qualifying features rely ▪ The population of each of the qualifying features ▪ The distribution of the qualifying features within the site
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form: ▪ Other urbanisation, industrial and similar activities- Inside & outside⁴⁹ ▪ Pollution to groundwater (point sources and diffuse sources)- Inside & outside ▪ Outdoor sports and leisure activities, recreational activities- Inside ▪ Changes in abiotic conditions- Inside & outside ▪ Industrial or commercial areas- Outside

⁴⁹ Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

Site Name: Exe Estuary Grid Reference: UK9010081 JNCC Site Code: UK9010081 Size: 2345.71ha Designation: SPA	Habitats Regulations Assessment: Data Proforma
Site Description	The Exe Estuary is located to the east of the National Park. The site extends 10 km south from Exeter to the open sea at Dawlish Warren. It comprises the waters, foreshore, low-lying land, three saltmarshes and an unusual double spit across the mouth of the estuary, and the sand dunes of Dawlish Warren. The mud- and sand-flats support Eelgrass <i>Zostera spp.</i> and <i>Enteromorpha</i> beds, and contain an abundance of invertebrates including extensive Mussel beds, which together provide rich feeding habitats for wintering waders and wildfowl. This complex of coastal habitats supports internationally important numbers of wintering and passage waterbirds.
Qualifying Features	■ Slavonian Grebe (<i>Podiceps auritus</i>) ■ Dark-bellied brent goose (<i>Branta bernicla bernicla</i>) ■ Avocet (<i>Recurvirostra avosetta</i>) ■ Eurasian oystercatcher (<i>Haematopus ostralegus</i>) ■ Grey plover (<i>Pluvialis squatarola</i>) ■ Dunlin (<i>Calidris alpina alpina</i>) ■ Black-tailed godwit (<i>Limosa limosa islandica</i>)
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; ■ The extent and distribution of the habitats of the qualifying features ■ The structure and function of the habitats of the qualifying features ■ The supporting processes on which the habitats of the qualifying features rely ■ The population of each of the qualifying features ■ The distribution of the qualifying features within the site.
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form:

Site Name: Exe Estuary Grid Reference: UK9010081 JNCC Site Code: UK9010081 Size: 2345.71ha Designation: SPA	Habitats Regulations Assessment: Data Proforma
	▪ Modification of cultivation practices- (Threats from inside⁵⁰) ▪ Changes in biotic conditions- (Threats from inside & outside) ▪ Outdoor sports and leisure activities, recreational activities- (Threats from inside) ▪ Changes in abiotic conditions- (Threats from inside & outside)

⁵⁰ Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

Site Name: Exe Estuary JNCC Site Code: UK11025 Size: 6806.3ha Designation: Ramsar	Habitats Regulations Assessment: Data Proforma
Site Description	The Exe Estuary is located to the east of the National Park. The site extends 10 km south from Exeter to the open sea at Dawlish Warren. The site encompasses the waters, foreshore, low-lying land, three marshes and an unusual double spit across the mouth of the estuary and sand dunes of Dawlish Warren. The site encompasses the waters, foreshore, low-lying land, three marshes and an unusual double spit across the mouth of the estuary and sand dunes of Dawlish Warren. This complex of habitats supports internationally important numbers of wintering and passage waterfowl, as well as populations of breeding birds and nationally important rare plants and invertebrates.
Qualifying Features	■ Assemblages of international importance ■ Dark-bellied brent goose (<i>Branta bernicla bernicla</i>) ■ Black-tailed godwit (<i>Limosa limosa islandica</i>)
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: ■ The extent and distribution of the habitats of the qualifying features ■ The structure and function of the habitats of the qualifying features ■ The supporting processes on which the habitats of the qualifying features rely ■ The population of each of the qualifying features ■ The distribution of the qualifying features within the site.
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form: ■ Modification of cultivation practices- (Threats from inside) ■ Changes in biotic conditions- (Threats from inside & outside) ■ Outdoor sports and leisure activities, recreational activities- (Threats from inside) ■ Changes in abiotic conditions- (Threats from inside & outside)