

Technical Note

Project	SA/SEA and HRA for the Fareham Local Plan Part 2: Development Sites and Policies	Date	December 2014
Note	Addendum	Ref	UE-0108
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1. Introduction

This technical note forms an Addendum to the combined Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA), and Habitats Regulations Assessment (HRA), for Fareham's Local Plan Part 2: Development Sites and Policies (DSP). Readers are referred to the following documents for more detailed information about the assessment processes, and which support the information contained in this note:

- ▶ SA/SEA Scoping Report (May 2012):
 - http://www.fareham.gov.uk/pdf/planning/DSPCoreDocuments/DSA01_Sustainability_Appraisal-Scoping_Report.pdf
- ▶ SA/SEA Options Assessment Report (October 2012):
 - http://www.fareham.gov.uk/pdf/planning/DSPCoreDocuments/DSA02_Sustainability_Appraisal-Site_Options_Assessment.pdf
- ▶ HRA Screening Statement (October 2012):
 - http://www.fareham.gov.uk/pdf/planning/DSPCoreDocuments/DHR01_Habitats_Regulation_Assessment-Screening_Statement.pdf
- ▶ SA/SEA Sustainability Report on the Publication DSP Plan (January 2014):
 - http://www.fareham.gov.uk/pdf/planning/DSPCoreDocuments/DSA05_Sustainability_Appraisal-Sustainability_Report_on_the_Publication_Development_Sites_and_Policies_Plan.pdf
- ▶ HRA Appropriate Assessment Report on the Publication DSP Plan (January 2014):
 - http://www.fareham.gov.uk/pdf/planning/DSPCoreDocuments/DHR02_Habitats_Regulation_Assessment-Appropriate_Assessment_Report_on_the_Publication_Development_Sites_and_Policies_Plan.pdf

The purpose of this Addendum is to provide information on the potential sustainability and ecological impacts of proposed modifications to the DSP Plan which have arisen during the course of the Plan's Examination in Public.

2. Proposed Modifications to the DSP Plan

Proposed modifications to the DSP Plan which are considered to potentially alter the findings of earlier stages of SA/SEA and HRA are listed below:

- ▶ Policy DSP7 (part): Frontage infill outside of Settlement Boundaries;
- ▶ Policy DSP7 (part): Changes of use to garden land outside of Settlement Boundaries;
- ▶ New Policy DSP7: Affordable Housing Exception Sites;
- ▶ Policy DSP40: Increasing flexibility through the re-wording of Policy DSP40 Housing Allocations;
- ▶ Policy DSP42: Allocating sites for Older Persons accommodation; and
- ▶ Policy DSP49: Safeguarding land for improvements to the Strategic Road Network.

The sections which follow explain the proposed modifications in detail and present a summary appraisal against the SA/SEA Framework, together with an assessment of whether they are likely to significantly affect a European site.

Policy DSP7 (part): Frontage infill outside of Settlement Boundaries

To reflect concerns raised during the Examination that Policy DSP7 is overly restrictive in relation to residential frontage infill in the countryside, the Council is minded to insert new criteria into Policy DSP7 which provides further clarification on the Council's position on frontage infill outside of the Defined Urban Settlement Boundaries, with new text underlined and deleted text ~~struck through~~:

Policy DSP7: New Residential Development Outside of the Defined Urban Settlement Boundaries

There will be a presumption against new residential development outside of the defined urban settlement boundaries (as identified on the Policies Map). New residential development will be permitted in instances where one or more of the following apply:

- i. It has been demonstrated that there is an essential need for a rural worker to live permanently at or near his/her place of work; or
- ii. It involves a conversion of an existing non-residential building where; or
 - a) the buildings proposed for conversion are of permanent and substantial construction and do not require major or complete reconstruction; and
 - b) evidence has been provided to demonstrate that no other suitable alternative uses can be found and conversion would lead to an enhancement to the building's immediate setting.
- iii. It comprises one or two new dwellings which infill an existing and continuous built-up residential frontage, where:
 - a) the new dwellings and plots are consistent in terms of size and character to the adjoining properties and would not harm the character of the area; and
 - b) it does not result in the extension of an existing frontage or the consolidation of an isolated group of dwellings; and
 - c) it does not involve the siting of dwellings at the rear of the new or existing dwellings.

A change of use of land outside of the defined urban settlement boundary to residential garden will not normally be permitted unless other environmental benefits can be secured.

New buildings should be well-designed to respect the character of the area and, where possible, should be grouped with existing buildings.

Proposals should have particular regard to the requirements of Core Strategy Policy CS14: Development Outside Settlements, and Core Strategy Policy CS6: The Development Strategy. They should avoid the loss of significant trees, should not have an unacceptable impact on the amenity of residents, and should not result in unacceptable environmental or ecological impacts, or detrimental impact on the character or landscape of the surrounding area.

The Sustainability Report on the Publication DSP Plan (January 2014) concluded that Policy DSP7 would have positive effects on SA Objectives SA1 (Housing), SA3 (Landscape), SA4 (Accessibility), SA7 (Biodiversity), SA10 (Vitality of Centres) and SA11 (Community), and neutral effects on all other objectives. The proposed modification to this part of Policy DSP7 takes a permissive approach to residential frontage infill development under certain circumstances rather than allocating new residential sites outside of Settlement Boundaries. In this respect, the proposed modification is not considered to alter the profile or scale of predicted effects of the original policy (see Appendix 1). Potential environmental effects are adequately controlled by the final part of the policy and other policies within the Local Plan. A slight uplift in the positive effect predicted for SA1 may be experienced because the permissive approach could allow greater scope for meeting local housing needs.

The HRA Screening Statement (October 2012) and Appropriate Assessment Report on the Publication DSP Plan (January 2014) assessed Policy DSP7 as unlikely to significantly affect any European site because the policy relates to qualitative criteria for development and would not itself lead to development. The proposed modification to the criteria for residential development outside of Settlement Boundaries is not considered to alter this conclusion (see Appendix 2).

Policy DSP7 (part): Changes of use to garden land outside of Settlement Boundaries

To reflect the concerns of the Inspector that the wording in Policy DSP7 on the change of use of land in the countryside to residential garden use was too rigid, the Council is proposing to make the following modifications. New text is underlined and deleted text is ~~struck through~~:

Policy DSP7: New Residential Development Outside of the Defined Urban Settlement Boundaries (PART)

A change of use of land outside of the defined urban settlement boundary to residential garden will only be not normally be permitted unless where: other environmental benefits can be secured.

- i. it is in keeping with the character, scale and appearance of the surrounding area; and
- ii. it will not detract from the existing landscape; and
- iii. it respects views into and out of the site.

The proposed modification is not considered to alter the profile or scale of the predicted sustainability effects of the original Policy DSP7, neither is it considered likely to significantly affect any European site.

New Policy DSP7: Affordable Housing Exception Sites

In order to provide sufficient flexibility, and to deliver the required level of affordable housing, the Council considers that an “Affordable Housing Exceptions Policy” is required in LP2. An “Affordable Housing Exceptions Policy” will allow for wholly affordable schemes to come forward outside of existing urban areas,

where it can be demonstrated that there is unmet need and where it meets other criteria. It is proposed to be located in Chapter 4, between current policies DSP7 and DSP8¹.

DSP7: Affordable Housing Exceptions Sites

Where there is clear evidence that affordable housing delivery is not meeting the target levels set out in Policy CS18 of the Core Strategy (excluding Welborne), planning permission may be granted for affordable housing on sites outside the existing urban area boundaries. Such proposals will only be permitted where:

- 100% affordable (as defined in the NPPF) units (net) are provided;
- The development is of a small scale and is located adjacent to, and well related to, the existing urban settlement boundaries;
- It is sensitively designed to reflect the character of the neighbouring settlement and to minimise any adverse impact on the Countryside and, if relevant, the Strategic Gaps;
- It will be brought forward by, and will be managed by, a not for profit social housing provider who is regulated by the Homes and Community Agency; and
- It is subject to a legal agreement to ensure that the units will be retained as affordable housing in perpetuity.

The proposed modification takes a permissive approach to affordable housing outside of existing urban areas under certain circumstances rather than allocating new residential sites outside of Settlement Boundaries. An assessment of new Policy DSP7 against the SA Objectives is presented at Appendix 1. This finds that the policy would lead to positive effects on SA1 (Housing), and particularly sub-criteria SA1a by helping to deliver affordable housing to meet local needs. The policy is assessed as neutral with respect to all other SA objectives because of the likely small scale of development that might be delivered under this policy, and because potential environmental effects are adequately controlled by bullets two and three of the policy and other policies within the Local Plan.

An HRA screening assessment of new Policy DSP7 is presented at Appendix 2. This finds that the policy is unlikely to significantly affect any European site because the policy relates to qualitative criteria for development and does not itself allocate sites for development.

Policy DSP40: Increasing flexibility through the re-wording of Policy DSP40 Housing Allocations

The NPPF makes it clear that Local Plans should have “sufficient flexibility to adapt to rapid change”. Whilst the overall approach in LP2 follows the strategy established in the Core Strategy, it could be argued that a reliance on a finite supply of urban area sites is not sufficiently flexible in relation to dealing with unforeseen changes in the delivery and supply of housing. To that end, the Council is recommending a modification that seeks to increase the flexibility of the approach in LP2 regarding the delivery of housing, including amendments to Policy DSP40: Housing Allocations and the supporting text. The Council will insert the following paragraph at the end of Policy DSP40: Housing Allocations.

¹ Policy DSP2 from the Publication Plan is proposed for deletion which means that Publication Policy DSP7 will become Policy DSP6, and the new Affordable Housing Exception Sites policy will be Policy DSP7.

DSP40: Housing Allocations

Where it can be demonstrated that the Council does not have a five year supply of land for housing against the requirements of the Core Strategy (excluding Welborne) additional housing sites, outside the urban area boundary, may be permitted where they meet all of the following criteria:

- The proposal is relative in scale to the demonstrated 5 year housing land supply shortfall;
- The proposal is sustainably located adjacent to, and well related to, the existing urban settlement boundaries, and can be well integrated with the neighbouring settlement;
- The proposal is sensitively designed to reflect the character of the neighbouring settlement and to minimise any adverse impact on the Countryside and, if relevant, the Strategic Gaps
- It can be demonstrated that the proposal is deliverable in the short term; and
- The proposal would not have any unacceptable environmental, amenity or traffic implications.

The Sustainability Report on the Publication DSP Plan (January 2014) concluded that Policy DSP40 would have positive effects on SA Objectives SA1 (Housing), SA4 (Accessibility), SA10 (Vitality of Centres) and SA11 (Community), and neutral effects on SA5 (Climate Change), SA8 (Natural Resources) and SA9 (Economy). Mixed effects were predicted for SA2, SA3, SA6 and SA7 on Heritage, Landscape, Pollution and Biodiversity respectively, however, these effects were considered to be highly site specific and were explored in greater detail during assessments of individual residential site allocations. The proposed modification to Policy DSP40 takes a permissive approach to residential development outside of existing urban areas under certain circumstances rather than allocating new residential sites outside of Settlement Boundaries. In this respect, the proposed modification is not considered to alter the profile or scale of predicted effects of the original policy (see Appendix 1). Potential environmental effects are adequately controlled by bullets 1, 2 3 and 5 of the policy and other policies within the Local Plan. A slight uplift in the positive effect predicted for SA1 may be experienced because the permissive approach could allow greater scope for meeting local housing needs.

The HRA Screening Statement (October 2012) and Appropriate Assessment Report on the Publication DSP Plan (January 2014) assessed each residential site allocation individually to determine the nature of site specific impacts, but concluded that the parts of Policy DSP40 which do not allocate land for development were unlikely to significantly affect any European site. The proposed modification to the criteria for residential development outside of Settlement Boundaries is not considered to alter this conclusion (see Appendix 2) because it does not identify specific sites to be allocated (and therefore cannot be assessed in detail). Proposals under this modification would need to be in conformity with other policies within the Local Plan and compliant with the Habitats Regulations.

Policy DSP42: Allocating sites for Older Persons accommodation

Despite the past rate of delivery of older persons' accommodation, the Council considers that the identification of specific sites for older persons' accommodation would be beneficial in securing older persons' accommodation across the Plan period. This would guarantee the continued delivery of units to meet demand and would ensure that sites considered suitable for older persons' accommodation are not lost to general market housing. The Council considers the following three sites suitable for older persons' accommodation:

- ▶ Fareham Station West (*already proposed for residential, now proposed for older persons' accommodation*)
- ▶ Genesis Centre, Locks Heath (*already proposed for residential, now proposed for older persons' accommodation*)
- ▶ Corner of Station Road and A27, Portchester (*previously considered for residential allocation in earlier draft of DSP Plan, now proposed for older persons' accommodation*)

The following paragraph is proposed to be added at the start of Policy DSP42.

DSP42: New Housing for Older Persons

Older Persons Accommodation will be permitted on the following sites:

- **Fareham Station West**
- **Genesis Centre, Locks Heath**
- **Corner of Station Road and A27, Portchester**

These sites should be developed in line with the principles set out in their respective Site Briefs. To ensure their availability they will be safeguarded from any other form of permanent development, including standard market housing, unless it can be demonstrated that older persons' accommodation is unviable.

The Sustainability Report on the Publication DSP Plan (January 2014) concluded that Policy DSP42 would have positive effects on SA Objectives SA1 (Housing), SA4 (Accessibility) and SA11 (Community), and neutral effects on all other objectives (see Appendix 1). The site specific effects of H16 (Fareham Station West) were explored in greater detail during assessments of individual residential site allocations, with recommended mitigation accordingly applied in the site development brief (for instance, in relation to loss of trees, land contamination and ecological impacts). H17 (Genesis Centre, Locks Heath) did not require detailed site assessment because it was predicted to lead to greater positive than negative effects overall. Whilst H20 (Corner of Station Road and A27, Portchester) was not proposed for allocation within the Publication DSP Plan, it had been previously assessed during earlier iterations of the SA/SEA (see Appendix 1). The appraisal for this site also predicted greater positive than negative effects overall, and no strongly negative impacts, and hence this site does not require detailed site assessment either.

The proposed modification from residential use to older persons' accommodation on these three sites is not considered to alter the profile or scale of predicted effects of the original policy or proposed allocations. Potential environmental effects are adequately controlled by the remaining provisions of Policy DSP42 and other policies within the Local Plan. A slight uplift in the positive effect predicted for SA1 may be experienced because the modification could allow greater scope for meeting local housing needs.

The HRA Screening Statement (October 2012) and Appropriate Assessment Report on the Publication DSP Plan (January 2014) found that Policy DSP42 was unlikely to significantly affect any European site because the policy relates to qualitative criteria for development and did not itself allocate sites for development. Although the proposed modification would now include allocated sites, these sites have been previously assessed during the HRA process.

The HRA Appropriate Assessment Report on the Publication DSP Plan (January 2014) predicted that H16 Fareham Station West (Site ID212) was likely to lead to significant effects on Portsmouth Harbour Special

Protection Area (SPA) and Ramsar site due to potential mobilisation of contaminants during remediation, demolition or construction, and possible subsequent aquatic pollution via linked hydrological pathways. It also found that the site could negatively affect Chichester & Langstone Harbours, Portsmouth Harbour and Solent and Southampton Water SPAs/Ramsars in combination with other allocations, as a result of its proximity to sites of Uncertain importance to Brent geese and waders outside of the SPA/Ramsar boundaries. However, the Appropriate Assessment Report on the Publication DSP Plan (January 2014) concluded that adverse effects were capable of being mitigated. The proposed modification from residential to older persons' accommodation is not considered to alter this conclusion. H17 Genesis Centre, Locks Heath and H20 Corner of Station Road and A27, Portchester were both assessed as unlikely to lead to significant effects on any European site at the screening stage. The proposed modification from residential to older persons' accommodation is not considered to alter this conclusion.

Policy DSP49: Safeguarding land for improvements to the Strategic Road Network

Newgate Lane (Southern Section)

Following consideration of recent reports from Hampshire County Council (HCC) the Council considers that the DSP Plan should be amended to reflect the proposals for improvements to Newgate Lane. In particular, the proposed alignment of Newgate Lane should be added to the Policies Map, and the supporting text should be amended to reflect this. Policy DSP49 does not require amending in this regard. The addition to the Policies Map is shown in Appendix 3.

Stubbington Bypass

The Council considers that the proposals for Stubbington Bypass are sufficiently advanced for safeguarding proposals to be justified and should be included in the DSP Plan. The proposed additional wording to policy DSP49 is given below, and additions to the Policies Map are shown in Appendix 3.

Policy DSP49: Improvements to the Strategic Road Network

The alignments shown on the Policies Map, ~~is~~ are safeguarded for the following proposals, which will improve and maintain the effectiveness of the Strategic Road Network:

- (A) B3385 Newgate Lane, Palmerston Drive –Peel Common;
- (B) ~~B3334 Gosport Road– B3334 Titchfield Road (Stubbington Bypass)~~

The parcels of land shown on the Policies Map, are safeguarded for the following proposals, which will improve and maintain the effectiveness of the junctions on the Strategic Road Network:

- (i) Segensworth Roundabout;
- (ii) A27/West Street/Station roundabout and Gudge Heath Lane Junction; and
- (iii) Delme Roundabout and A27 approaches.

The Sustainability Report on the Publication DSP Plan (January 2014) concluded that Policy DSP49 would have positive effects on SA Objectives SA4 (Accessibility), SA9 (Economy) and SA11 (Community), and neutral effects on all other objectives. Proposals to safeguard the route of improvements to the strategic road network, including the proposed modification to Policy DSP49 regarding the Stubbington Bypass, seek to prevent the land being developed for other uses rather than specifically allocating them for new road projects. Final route alignments will be developed by Hampshire County Council and will need to be in general conformity with the Local Transport Plan and other policies in the Fareham Borough Local Plan, as

well as being compliant with all relevant environmental assessment and protection legislation. In this respect, the proposed modification is not considered to alter the profile or scale of predicted effects of the original policy (see Appendix 1).

The HRA Screening Statement (October 2012) and Appropriate Assessment Report on the Publication DSP Plan (January 2014) found that Policy DSP49 was unlikely to significantly affect any European site because the policy positively steers development away from European sites and associated sensitive areas. The proposed modification is not considered to alter this conclusion (see Appendix 2) because the route of the safeguarded alignments do not pass within 200m of any European site, this being the maximum distance over which significant atmospheric pollution impacts are considered to operate.

3. Conclusion

In conclusion, the proposed modifications to the Fareham Local Plan Part 2: Development Sites and Policies are not predicted to alter the profile or scale of sustainability effects resulting from the Publication Plan, and neither are they considered likely to significantly affect any European site.

Appendix 1: Revised SA/SEA High Level Assessment for Proposed Modifications to DSP Policies

Please see insert.

Fareham Borough Development Sites and Policies Plan

SEA Objectives

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11
ID Proposed Modifications following Examination												
DSP7	(PART): Frontage infill outside of Settlement Boundaries	+	0	+	+	0	0	+	0	0	+	+
DSP7	(PART): Changes of use to garden land outside of Settlement Boundaries	+	0	+	+	0	0	+	0	0	+	+
DSP7	(NEW): Affordable Housing Exception Sites	+	0	0	0	0	0	0	0	0	0	0
DSP40	Increasing flexibility through the re-wording of Policy DSP40 Housing Allocations	+	+/-	+/-	+	0	+/-	+/-	0	0	+	+
DSP42	Allocating sites for Older Persons accommodation	+	0	0	+	0	0	0	0	0	0	+
H16	Fareham Station West	+	0	-	+	0	--	-	0	+	+	0
H17	Genesis Centre, Locks Heath	+	0	-	+	0	0	-	0	0	+	+
H20	Corner of Station Road and A27, Portchester	+	0	0	+	-	0	0	0	0	0	+
DSP49	Safeguarding land for improvements to the Strategic Road Network	0	0	0	+	0	0	0	0	+	0	+
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11

Key to the High Level Assessment Matrix

++	Likely strong positive effect
+	Likely positive effect
0	Neutral/no effect
-	Likely adverse effect
--	Likely strong adverse effect
+/-	Uncertain effects

SEA Objectives

- 1 To provide good quality and sustainable housing for all
- 2 To conserve and enhance built and cultural heritage
- 3 To conserve and enhance the character of the landscape
- 4 To promote accessibility and encourage travel by sustainable means
- 5 To minimise carbon emissions and promote adaptation to climate change
- 6 To minimise air, water, light and noise pollution
- 7 To conserve and enhance biodiversity
- 8 To conserve and manage natural resources (water, land, minerals, agricultural land, materials)
- 9 To strengthen the local economy and provide accessible jobs available to residents of the borough
- 10 To create vital and viable new centres which complement existing centres
- 11 To create a healthy and safe community

Appendix 2: Revised HRA Screening Assessment for Proposed Modifications to DSP Policies

Please see insert.

		SAC						SPA				Ramsar			
		Butser Hill	Emer Bog	River Itchen	Solent and Isle of Wight Lagoons	Solent Maritime	The New Forest	Chichester and Langstone Harbours	Portsmouth Harbour	Solent and Southampton Water	The New Forest	Chichester and Langstone Harbours	Portsmouth Harbour	Solent and Southampton Water	The New Forest
Fareham Borough Development Sites and Policies Plan															
ID	Proposed Modifications following Examination														
DSP7	(PART): Frontage infill outside of Settlement Boundaries	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1
DSP7	(PART): Changes of use to garden land outside of Settlement Boundaries	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1
DSP7	(NEW): Affordable Housing Exception Sites	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1
DSP40	Increasing flexibility through the re-wording of Policy DSP40 Housing Allocations	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1
DSP42	Allocating sites for Older Persons accommodation	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1	A1
H16	Fareham Station West	A4	A4	A4	A4	A4	A4	D1/D2	C2	D1/D2	A4	D1/D2	C2	D1/D2	A4
H17	Genesis Centre, Locks Heath	A4	A4	A4	A4	A4	A4	A4	A4	A4	A4	A4	A4	A4	A4
H20	Corner of Station Road and A27, Portchester	A4	A4	A4	A4	A4	A4	A4	A4	A4	A4	A4	A4	A4	A4
DSP49	Safeguarding land for improvements to the Strategic Road Network	A4	A4	A4	A4	A4	A4	A4	A4	A4	A4	A4	A4	A4	A4
Assessment Key															
Category A: No negative effect															
A1	Options / policies that will not themselves lead to development e.g. because they relate to design or other qualitative criteria for development, or they are not a land use planning policy.														
A2	Options / policies intended to protect the natural environment, including biodiversity.														
A3	Options / policies intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on a European Site.														
A4	Options / policies that positively steer development away from European sites and associated sensitive areas.														
A5	Options / policies that would have no effect because development is implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites.														
Category B: No significant effect															
B	Options / policies that could have an effect, but the likelihood is there would be no significant negative effect on a European site either alone or in combination with other elements of the same plan, or other plans or projects.														
Category C: Likely significant effect alone															
C1	The option, policy or proposal could directly affect a European site because it provides for, or steers, a quantity or type of development onto a European site, or adjacent to it.														
C2	The option / policy could indirectly affect a European site e.g. because it provides for, or steers, a quantity or type of development that may be ecologically, hydrologically or physically connected to it or increase disturbance.														
C3	Proposals for a magnitude of development that, no matter where it was located, the development would be likely to have a significant effect on a European site.														
C4	An option / policy that makes provision for a quantity / type of development but the effects are uncertain because its detailed location is to be selected following consideration of options in a later, more specific plan.														
C5	Options / policies for developments or infrastructure projects that could block alternatives for the provision of other development in the future, that may lead to adverse effects on European sites, which would otherwise be avoided.														
C6	Options, policies or proposals which are to be implemented in due course - if implemented in one or more particular ways, the proposal could possibly have a significant effect on a European site.														
C7	Any other options, policies or proposals that would be vulnerable to failure under the Habitats Regulations at project assessment stage; to include them in the plan would be regarded by the EC as 'faulty planning'.														
C8	Any other proposal that may have an adverse effect on a European site, which might try to pass the tests of HRA at project level by arguing that the plan provides IROPI to justify its consent despite a negative assessment.														
Category D: Likely significant effects in combination															
D1	The option, policy or proposal alone would not be likely to have significant effects but if its effects are combined with the effects of other policies within the same plan the cumulative effects would be likely to be significant.														
D2	Options, policies or proposals that alone would not be likely to have significant effects but if their effects are combined with the effects of other plans or projects, the combined effects would be likely to be significant.														
D3	Options or proposals that are, or could be, part of a programme or sequence of development delivered over a period, where the implementation of the later stages could have a significant effect on European sites.														
?	Uncertain effects because the issue/option currently lacks detail. The screening assessment will be re-visited as more detail becomes available.														

Appendix 3: Improvements to the Strategic Road Network – Changes to the Policies Map

