



**TELFORD & WREKIN LOCAL PLAN  
PUBLICATION VERSION**

**HABITATS REGULATIONS ASSESSMENT  
SCREENING REPORT**

**December 2015**

*enfusion*



# HABITATS REGULATIONS ASSESSMENT SCREENING REPORT

## Telford & Wrekin Local Plan Publication Version

<i>date:</i>	December 2015	
<i>prepared for:</i>	Telford & Wrekin Council	
<i>prepared by:</i>	Alastair Peattie Cheryl Beattie	Enfusion
<i>quality assurance:</i>	Alastair Peattie	Enfusion

*enfusion*

environmental planning and management for sustainability



Treenwood House  
Rowden Lane  
Bradford on Avon  
BA15 2AU  
t: 01225 867112  
[www.enfusion.co.uk](http://www.enfusion.co.uk)

<b>CONTENTS</b>		<b>PAGE</b>
<b>1</b>	<b>INTRODUCTION</b>	<b>1</b>
	Background	1
	Consultation	2
	Purpose and Structure of Report	2
<b>2</b>	<b>HABITATS REGULATIONS ASSESSMENT (HRA) &amp; THE PLAN</b>	<b>3</b>
	Requirement for Habitats Regulations Assessment (HRA)	3
	Guidance and Good Practice	3
	Draft Local Plan - Key Proposals	5
<b>3</b>	<b>SCREENING</b>	<b>9</b>
	Previous Screening Work	9
	Screening the Draft Local Plan 2015	10
<b>5</b>	<b>HRA CONCLUSIONS</b>	<b>25</b>
	Consultation and Further Work	26
	<b>TABLES &amp; FIGURES</b>	
	Table 2.1: Habitats Regulations Assessment: Key Stages	4
	Table 2.2: Draft Local Plan Aims & Objectives	5
	Table 3.1: Housing, Employment and Infrastructure Development: Summary of Impacts and Effects on European Sites	13
	Table 3.2: Draft Local Plan Policies identified as having impacts that could lead to LSE	14
	Table 3.3: HRA Screening Summary	17
	Table 3.4: Screening Summary Key	17
	Figure 2.1: Draft Local Plan Key Diagram	8
	Figure 3.1: European Site Characterisations	12
	Table 4.1: Summary of Policy Number Changes Following Consultation 2015	26
	<b>APPENDICES</b>	
<b>I</b>	European Site Characterisations	
<b>II</b>	Plans, Programmes and Projects Review	
<b>III</b>	Draft Local Plan Policy Screening	
<b>IV</b>	European Site Screening	
<b>V</b>	HRA Screening of Local Plan Changes	

## 1.0 INTRODUCTION

- 1.1 Telford & Wrekin Council is preparing a Local Plan to guide future development in the Local Authority area. The Local Plan will set out an overall strategy to guide development across the borough in the period up to 2031. It sets out how much new development (land for housing and employment) is needed, and where this development should take place, as well as provides information about the infrastructure (roads, schools, open spaces, etc) needed to support new development.
- 1.2 Enfusion has been commissioned to progress the Habitats Regulations Assessment (HRA) of the Draft and Publication Version of the Local Plan on behalf of the Council in their role as the competent authority. At the same time Enfusion was also commissioned to undertake the Sustainability Appraisal (incorporating Strategic Environmental Assessment) of the Draft and Publication Version of the Local Plan and this work has been undertaken concurrently, with the two processes informing each other as appropriate.

### **Background**

- 1.3 The HRA process for the plan began in 2012 with a scoping exercise. This information was presented in a Screening Report, which identified eight European sites outside the Plan area that are potentially within the influence of the emerging Local Plan.
- 1.4 In 2013, the Council produced and published a Shaping Place Strategy & Options Document, which set out a number of options for the overall level and distribution of growth, as well as potential options for policies. Given the early stage in plan-making a high level HRA Screening was carried out in 2013 and identified the potential impacts of some of the development proposed in the Strategy & Options Document. The HRA Screening Report was published alongside the Strategy & Options Document for consultation in June 2013. The screening considered that the while direction of growth was unclear there was the potential for eight European sites to be directly and indirectly affected by the Draft Local Plan. It concluded that all eight European sites should be carried forward to full Appropriate Assessment and that this should be carried out in parallel with the preparation of the Draft Local Plan stage, as there will be more clarity with regard to the level and location of growth. Comments were received from NE and helped to inform the iterative and ongoing HRA process
- 1.5 Following further technical studies a number of potential site options were presented in the Proposed Housing and Employment Sites (PHES) Document, which published for consultation in May 2014. The Document also proposed an overall level of growth of 20,000 dwellings during the life of the Local Plan. A high level HRA Screening of proposed housing sites was carried out and the assessment concluded

that 77 of the 79 proposed housing sites and 46 of the 48 proposed employment sites are not likely to have significant effects on European sites. The remaining 2 housing and 2 employment sites a likely significant effect could not be ruled out due to lack of information relating to foul water treatment and aerial emissions on the Midland Meres and Mosses Ramsar Phase 2. The screening recommended that the HRA decision for these 4 sites should be passed down to the lower level of plan-making when further detail is available.

- 1.6 A screening of the Draft Local Plan, including policies and preferred site allocations, was carried out by Enfusion in the summer of 2015. The screening identified five Draft Local Plan Policies for which the impacts could potentially lead to significant effects either alone, or more likely in-combination with other plans, programmes and projects. The five policies and their potential impacts were then screened against each of the eight European sites scoped into the HRA. The screening concluded that the Draft Local Plan was not likely to have significant effects on any European sites. The method and findings of this work were presented in a HRA Screening Report (July 2015) that accompanied the Draft Local Plan on public consultation from 03 August 2015 to 25 September 2015. No comments were received in relation to the HRA.
- 1.7 Following the consultation on the Draft Local Plan, the Council has made a number of changes to the Plan. It is important that these changes are screened to determine if they significantly affect the findings of the previous HRA Screening work for the Draft Local Plan.

### **Consultation**

- 1.8 The Habitats Regulations require the plan making/competent authority to consult the appropriate nature conservation statutory body. Comments from the statutory nature conservation bodies were received on the HRA Screening of the Shaping Places Strategy & Options Document (June 2013). These comments and any advice provided have been taken forward in the iterative HRA work documented in this report. No comments were received in relation to the HRA Screening Report (July 2015) for the Draft Local Plan.
- 1.9 The Habitats Regulations leave consultation with other bodies and the public to the discretion of the plan making authority. Therefore, in addition to the statutory consultation undertaken with the appropriate nature conservation body, this updated HRA Screening Report is available for wider public consultation alongside the Local Plan Publication Version.

### **Purpose & Structure of Report**

- 1.10 This report documents the process and the findings of the HRA screening for the Draft Local Plan as well as the findings of the screening of the changes made to the Plan since the publication of

the HRA Screening Report (July 2015) in August 2015. Following this introductory section the document is organised into a further four sections:

- **Section 2** summarises the requirement for HRA and the background to the Draft Local Plan.
- **Section 3** outlines the screening process and the findings of the screening assessment as well as the consideration of changes to the Plan.
- **Section 4** summarises the findings of the HRA and sets out the next steps.

## 2.0 HABITATS REGULATIONS ASSESSMENT (HRA) AND THE PLAN

### Requirement for Habitats Regulations Assessment

- 2.1 The Conservation of Habitats and Species Regulations 2010 (as amended) [the Habitats Regulations] require that HRA is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the conservation objectives of any site designated for its nature conservation importance.
- 2.2 The Habitats Regulations transpose the requirements of the European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna [the Habitats Directive] which aims to protect habitats and species of European nature conservation importance. The Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 sites or European Sites, and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) which are designated under European Directive (2009/147/EC) on the conservation of wild birds [the Birds Directive]. In addition, Government guidance also requires that Ramsar sites (which support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance [Ramsar Convention]) are included within the HRA process as required by the Regulations.
- 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 land-use plan, when considered in combination with the effects of other plans and projects against the conservation objectives of a European Site; would adversely affect the integrity of that site. Where effects are considered uncertain, the potential for adverse impacts should be assumed.

### Guidance and Good Practice

- 2.4 The application of HRA to Local Plans has been informed by a number of key guidance and practice documents. Draft guidance for HRA 'Planning for the Protection of European Sites: Appropriate Assessment', was published by the Government (DCLG, 2006) and is based on the European Commission's (2001) guidance for the Appropriate Assessment of Plans. The DCLG guidance recommends three main stages to the HRA process:
  - **Stage 1:** Screening for Likely Significant Effect
  - **Stage 2:** Appropriate Assessment, Ascertainning Effects on Integrity
  - **Stage 3:** Mitigations Measures and Alternatives Assessment.

- 2.5 If alternative solutions or avoidance/ mitigation measures to remove adverse effects on site integrity cannot be delivered then current guidance recommends an additional stage to consider Imperative Reasons of Overriding Public Interest (IROPI) for why the plan should proceed. For the HRA of land use plans IROPI is only likely to be justified in a very limited set of circumstances and must be accompanied by agreed, deliverable compensation measures for the habitats and species affected. For this reason the IROPI stage is not detailed further in this report.
- 2.6 More recently Natural England has produced additional, detailed guidance on the HRA of Local Development Documents (Tyldesley, 2009 (as updated)) that complements the DCLG guidance, and builds on assessment experience and relevant court rulings. The guidance: sets out criteria to assist with the screening process; addresses the management of uncertainty in the assessment process; and importantly outlines that for the HRA of plans; ' ... what is expected is as rigorous an assessment as can reasonably be undertaken in accordance with the requirements of the Regulations ...'.
- 2.7 The approach taken for the HRA of the Draft Local Plan follows the method set out in formal guidance documents. The key stages of the HRA process overall, and the specific tasks undertaken for each stage are set out in Table 2.1.

**Table 2.1: Habitats Regulations Assessment: Key Stages**

Stages	Habitats Regulations Assessment
<b>Stage 1: Screening for Likely significant Effects</b>	1. Identify European sites in and around the plan area.
	2. Examine the conservation objectives of each interest feature of the European site(s) potentially affected.
	3. Analyse the policy/ plan and the changes to environmental conditions that may occur as a result of the plan. Consider the extent of the effects on European 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 effects are judged likely or uncertainty exists – the precautionary principle applies proceed to <b>Stage 2</b> .
<b>Stage 2: Appropriate Assessment</b>	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.
<b>Stage 3: Mitigation Measures and Alternatives Assessment</b>	1. 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).
	2. Prepare HRA/ AA report and consult statutory body.
	3. Finalise HRA/AA report in line with statutory advice to accompany plan for wider consultation.

## Telford & Wrekin Draft Local Plan - Key Proposals

### Aims & Objectives

- 2.8 The Draft Local Plan coordinates future development within the administrative boundary of the borough of Telford & Wrekin for the period 2011 to 2031. It replaces the *Core Strategy (2007)* and the policies which were saved from the *Wrekin Local Plan (2000)* and the *Central Telford Area Action Plan (2011)*. The Local Plan will set out an overall strategy to guide development across the borough in the period up to 2031. It sets out how much new development (land for housing and employment) is needed and where this development should take place as well as provides information about the infrastructure (roads, schools, open spaces, etc) needed to support new development.
- 2.9 The aim of the Local Plan is to help sustain and enhance the quality of the borough and the quality of life for those who live and work in and visit the borough. The vision is summarised as follows:
- By 2031, Telford & Wrekin will be a healthier, more prosperous and better connected place than it is today.
  - It will have a population of approximately 198,000 people.
  - Development and regeneration will be focused in Telford and Newport.
  - Communities in the rural area will supported.
  - The environment will be protected and improved.
  - New development and investment will provide a high quality of life for those who live and work in and visit the area.
- 2.10 The aims and objectives are an expansion of the vision and provide the basis for the Spatial Strategy and the Detailed Policies. They also respond to the wider strategies and priorities of the Council and its partners such as the Health and Wellbeing Strategy. The Draft Local Plan aims and objectives are set out in the table below.

**Table 2.2: Draft Local Plan Aims & Objectives**

Economy
<p><b>Aim 1: Promote prosperity and opportunity for everyone</b></p> <p>Objectives:</p> <ol style="list-style-type: none"> <li>1. Support the delivery of 110 hectares of employment land on a range of sites across the borough;</li> <li>2. Support and enhance the network of local urban centres in Telford as the focus for local business, shopping, community facilities and residential development well served by public transport, walking and cycling;</li> <li>3. Consolidate and strengthen Newport's role as a market town;</li> <li>4. Support and enable the development of rural enterprises;</li> <li>5. Expand the borough's leisure, tourism and business visitor offer supporting Destination Telford;</li> <li>6. Support actions which reduce the skills gap between employers and the local workforce;</li> <li>7. Support measures which reduce youth unemployment.</li> </ol>

<b>Housing</b>
<p><b>Aim 2: Meet local housing needs and aspirations</b></p> <p>Objectives:</p> <p>8. Support delivery of 15,000 new dwellings across the whole borough by 2031;</p> <p>9. Ensure new developments deliver a range of housing types and tenures that meet the needs of specific household groups;</p> <p>10. Ensure an appropriate proportion of new dwellings are affordable;</p> <p>11. Improve the quality of new and existing housing;</p> <p>12. Meet the identified housing needs of gypsies and travellers.</p>
<b>Natural Environment</b>
<p><b>Aim 3: Harness the borough's natural environment</b></p> <p>13. Ensure that green infrastructure is planned, designed and managed to meet site, local and strategic needs including the delivery of fifty new 'Green Guarantee' spaces;</p> <p>14. Ensure that nationally and locally significant natural landscapes such as the Area of Outstanding Natural Beauty are protected and managed appropriately;</p> <p>15. Safeguard and enhance the borough's biodiversity.</p>
<b>Community</b>
<p><b>Aim 4: Promote more socially cohesive, healthy and active communities</b></p> <p>Objectives:</p> <p>16. Enable healthier lifestyles and improve the health and wellbeing of the population;</p> <p>17. Address social and economic deprivation;</p> <p>18. Enhance the borough's education and training facilities;</p> <p>19. Support the creation of safe and secure environments;</p> <p>20. Enable people to live independently for longer;</p> <p>21. Sustain and enhance the vitality of rural settlements.</p>
<b>Connections</b>
<p><b>Aim 5: Enhance the infrastructure for improved access and communication</b></p> <p>Objectives:</p> <p>22. Support the continued provision of a highly accessible and integrated transport network;</p> <p>23. Encourage and help enable greater access by non-vehicular means to local green space, services and locations of employment;</p> <p>24. Enhance broadband and mobile networks across the borough.</p>
<b>Built Environment</b>
<p><b>Aim 6: Value the cultural and heritage assets</b></p> <p>Objectives:</p> <p>25. Achieve high quality urban design which responds to local context and which provides opportunities for innovation;</p> <p>26. Safeguard the character and setting of the borough's built and natural heritage, including Ironbridge Gorge World Heritage Site and the Wrekin;</p> <p>27. Protect and enhance the borough's local distinctiveness.</p>
<b>Environmental Resources</b>
<p><b>Aim 7: Reduce the environmental impact of new development</b></p> <p>Objectives:</p> <p>28. Promote solutions that reduce energy demands on non-renewable energy sources;</p> <p>29. Safeguard the borough's limited minerals resources for future generations;</p> <p>30. Support measures to increase household recycling rates;</p> <p>31. Ensure development mitigates for and enables adaption to the effects of climate change;</p>

- 32. Encourage the most efficient use of land and existing buildings to meet local needs;
- 33. Protect the borough's water quality and reduce the risk of flooding.

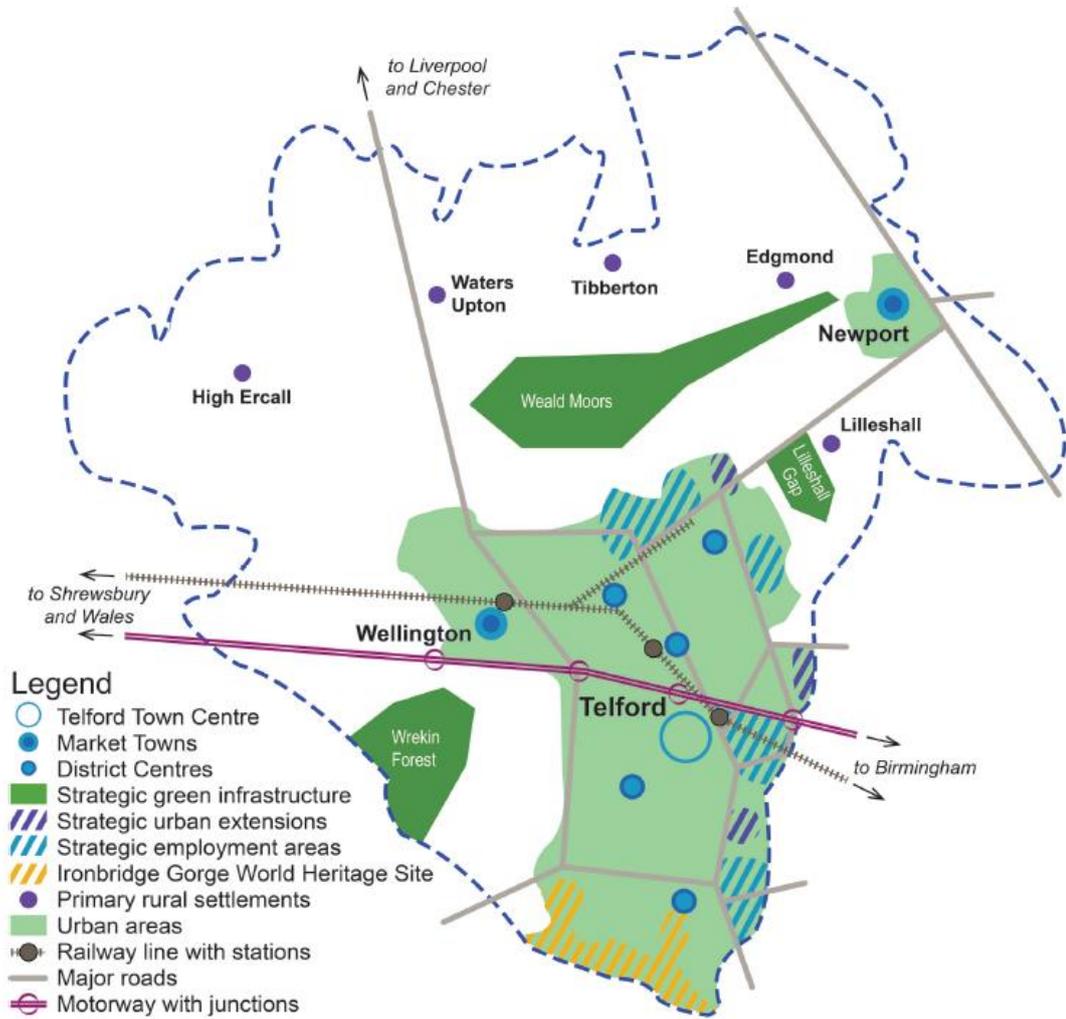
### **Level and Distribution of Growth**

- 2.11 The Local Plan proposes the delivery of at least 15,555 new dwellings and 120 ha of new employment land across the borough up to 2031. Telford will be the principal focus for growth with the Draft Local Plan identifying sufficient land to deliver approximately 13,313 new homes, which includes a number of strategic urban extensions, as well as 110 ha of employment land. The Plan supports the development of approximately 1,182 new homes in Newport and 10 ha of employment land to the south of the settlement. A small amount of development is proposed in the rural areas to help meet needs, this includes the delivery of approximately 902 new dwellings up to 2031.
- 2.12 The Draft Local Plan also proposes a number of specific site allocations for housing and employment which are identified in Appendix C and D of the Draft Local Plan. It also contains a wide range of policies that relate to a number of different topics including; housing, the economy, the natural environment, community, connections, built environment and environmental resources.

### **Overview of Plan Area**

- 2.13 The spatial extent of the Draft Local Plan is shown in Figure 2.1 below.

**Figure 2.1: Draft Local Plan Key Diagram**



## 3.0 SCREENING

- 3.1 As detailed in Section 2, Table 2.1, HRA typically involves a number of stages. This section of the report sets out the approach and findings for Stage 1 of the HRA process, the HRA Screening for the Draft Local Plan. The aim of the screening stage is to assess in broad terms whether the policies and proposals set out in the plan are likely to have a significant effect on a European site(s), and whether in the light of available avoidance and mitigation measures, an Appropriate Assessment (AA) is necessary.

### Previous Screening Work

#### Scoping 2012

- 3.2 It was noted in Section 1 that a scoping exercise was carried out in 2012 for the emerging Local Plan. The findings of this work were reported in the HRA Screening Report Stage. Given the early stage in plan-making the purpose of the scoping exercise was to identify which European sites were potentially within the influence of the emerging Local Plan.
- 3.3 The scoping identified the following eight European sites, outside of the Plan area, that should be scoped into the HRA process for the emerging Shaping Places Local Plan:
- Cannock Chase SAC
  - Midland Meres and Mosses (Ramsar – Phase 1)
  - Midland Meres and Mosses (Ramsar – Phase 2)
  - Motte Meadows SAC
  - Severn Estuary SAC
  - Severn Estuary Ramsar
  - Severn Estuary SPA
  - West Midlands Mosses SAC
- 3.4 The HRA Screening Report (April 2012) identified a number of plans and projects that have the potential to act in combination with the Local Plan in Appendix 1. Information on the European sites, including conservation objectives, qualifying features and vulnerabilities, were provided in Appendix 3.
- 3.5 Given the early stage in plan-making there wasn't sufficient detail in terms of the overall level and distribution of growth to determine if there was the potential for likely significant effects. However, the HRA did identify some broad mechanisms by which proposals contained in the Local Plan might affect European sites. These included:
- Alteration in water quality
  - Increased water abstraction
  - Increased run off from new roads and development

- Air pollution from development work
- Air pollution from increased traffic in the long term
- Increased NOx gasses
- Increased sulphur dioxide
- Increased Acid deposition
- Increased Nitrogen deposition
- Increased recreational use and disturbance including dog walking
- Increased fishing on open water sites
- Increased introduced and invasive species issues
- Alterations in site management
- Increased hunting pressure from domestic animals e.g. cats

### ***Screening the Shaping Places Strategy & Options 2013***

- 3.6 In 2013, the Council produced and published a Shaping Place Strategy & Options Document, which set out a number of options for the overall level and distribution of growth, as well as potential options for policies. A high level HRA Screening was carried out to consider if the development proposed in the Strategy & Options Document has the potential for significant effects on the eight European sites identified through the scoping exercise in 2012. The findings of this work were presented in a HRA Screening Report, which was published alongside the Strategy & Options Document for consultation in June 2013.
- 3.7 The screening considered that the while direction of growth was still unclear, there is the potential for direct and indirect effects on the eight European sites scoped into the assessment. It concluded that the European sites should be carried forward to full Appropriate Assessment and that this should be carried out in parallel with the preparation of the Draft Local Plan stage, as there will be more clarity with regard to the level and location of growth.
- 3.8 The HRA Screening Report (June 2013) identified a number of plans and projects that have the potential to act in combination with the Local Plan in Appendix 1. Information on the European sites, including conservation objectives, qualifying features and vulnerabilities, was provided in Appendix 4. Comments were received from NE in July 2013 and these helped to inform the iterative and ongoing HRA process

### ***Screening the Proposed Housing and Employment Sites Document 2014***

- 3.9 Following consultation on the Strategy & Options Document and HRA Screening Report, further technical studies were carried out by the Council. The further evidence helped the Council to identify a preferred level of growth along with a number of potential sites to accommodate development. The Proposed Housing and Employment Sites (PHES) Document was published in May 2014 and set an overall level of growth of 20,000 dwellings during the life of the Local Plan along with a number of potential housing and employment sites.

- 3.10 A screening of the proposed housing and employment sites was carried out in 2014, with the findings presented in the HRA Screening Stage 3 Report published in August 2014. The screening considered the potential for likely significant effects of proposed development on the eight European sites originally scoped into the process along with the Stiperstones and the Hollies SAC on a precautionary basis.
- 3.11 The screening considered the 79 housing sites (two of these mixed use) and 46 proposed employment sites proposed within the PHES Document (May 2014). The assessment found that 77 of the 79 proposed housing sites and 46 of the 48 proposed employment sites were not likely to have significant effects on the identified European sites. Likely significant effects could not be ruled out for the two remaining housing and employment sites in Newport as a result of uncertainties with regard to the capacity of Newport Sewage Treatment Works. The screening recommended that the HRA decision for these 4 sites should be passed down to the lower level of plan-making when further detail is available.

## **Screening the Telford and Wrekin Draft Local Plan 2015**

### **Identification of European Sites**

- 3.12 The European sites scoped into the previous screening assessments and set out below are still considered appropriate for the further screening work for the Draft Local Plan. Given the findings of the screening work carried out in 2014 and the distance of the site from the plan area (over 20km) the Stiperstones and the Hollies SAC has not been scoped into this HRA screening. No further comments have been received from statutory consultees with regard to the scope of the HRA and the changes to the Plan are not considered likely to significantly affect the European sites scoped in. The European sites scoped into the HRA for the Draft Local Plan are set out below:

- Cannock Chase SAC
- Midland Meres and Mosses (Ramsar – Phase 1)
- Midland Meres and Mosses (Ramsar – Phase 2)
- Motte Meadows SAC
- Severn Estuary SAC
- Severn Estuary Ramsar
- Severn Estuary SPA
- West Midlands Mosses SAC

### **Characterisation of European Sites**

- 3.13 A general overview of the European sites scoped into the assessment is provided below in Figure 3.21. More detailed characterisations including conservation objectives and the specific vulnerabilities for each site are provided in Appendix I.

**Figure 3.1: European Site Characterisations**

**Cannock Chase SAC<sup>1</sup>**

Cannock Chase is a large, diverse area of semi-natural vegetation comprising the most extensive area of lowland heathland in the Midlands with alder woodland, oak wood pasture and valley mires. It is home to breeding Nightjar, Woodlark, occasionally Dartford warbler and a diverse invertebrate fauna.

The character of the vegetation is intermediate between the upland or northern heaths of England and Wales and those of southern counties. Cannock Chase Special Area of Conservation is also a Country Park and lies in the heart of Cannock Chase Area of Outstanding Natural Beauty. Given its location it is a popular outdoor recreation destination and is subject to high visitor pressure. The Cannock Chase SAC Partnership has been set up to deliver robust access management measures to mitigate the negative effects of predicted future increases in recreational usage of the SAC. Current management of SAC land is targeted at restoring and strengthening the heathland vegetation mosaics.

**Midland Meres & Mosses Ramsar (Phase 1 & 2)<sup>2</sup>**

The Meres & Mosses form a geographically discrete series of lowland open water and peatland sites in the north-west Midlands of England. These have developed in natural depressions in the glacial drift left by receding ice sheets which formerly covered the Cheshire/Shropshire Plain. The 16 (Phase 1) & 18 (Phase 2) component sites include open water bodies (meres), the majority of which are nutrient-rich with associated fringing habitats; reed swamps, fen, carr & damp pasture. Peat accumulation has resulted in nutrient poor peat bogs (mosses) forming in some sites in the fringes of meres or completely infilling basins. In a few cases the result is a floating quaking bog or schwingmoor. The wide range of resulting habitats support nationally important flora & fauna.

**Mottey Meadows SAC<sup>3</sup>**

This site is an outstanding floristically-diverse mesotrophic grassland where traditional late hay cutting and aftermath grazing has been perpetuated, largely unaffected by modern agricultural practices. The site is important because of its large size, variety of grassland community types and presence of rare species. Furthermore it contains an extensive example of an alluvial flood meadow.

**Severn Estuary SPA, SAC & Ramsar<sup>4</sup>**

The Severn Estuary is located between Wales and England in south-west Britain. It is a large estuary with extensive intertidal mud-flats and sand-flats, rocky platforms and islands. Saltmarsh fringes the coast backed by grazing marsh with freshwater ditches and occasional brackish ditches. The

<sup>1</sup> Natural England (2014) Cannock Chase SAC Site Improvement Plan.

<sup>2</sup> JNCC – Midland Meres & Mosses Ramsar Phase 1 Information Sheet.

<sup>3</sup> Natural England (2014) Mottey Meadows SAC Site Improvement Plan.

<sup>4</sup> Natural England (2014) Severn Estuary SAC & SPA Site Improvement Plan.

subtidal seabed is rock and gravel with subtidal sandbanks. The site also supports reefs of the tube forming worm *Sabellaria alveolata*.

The estuary's classic funnel shape, unique in the UK, is a factor causing the Severn to have one of the highest tidal ranges in the world. A consequence of the large tidal range is an extensive intertidal zone, one of the largest in the UK. The tidal regime results in plant and animal communities typical of the extreme physical conditions of liquid mud and tide-swept sand and rock. The species-poor intertidal invertebrate community includes high densities of ragworms, lugworms and other invertebrates forming an important food source for passage and wintering waders and fish.

]The site is of importance during the spring and autumn migration periods for waders, as well as in winter for large numbers of waterbirds, especially swans, ducks and waders. The fish fauna is very diverse with more than 110 species identified. The site is of particular importance for migratory fish.

#### West Midlands Mosses SAC<sup>5</sup>

The West Midlands Mosses comprises four sites: Clarepool Moss, Abbots Moss, Chartley Moss and Wybunbury Moss.

These support large basin mires which have developed as quaking bogs, known as Schwingmoors, together with a variety of associated hollows and pools showing various types and stages of mire development. This complexity of habitats gives rise to a diverse assemblage of associated plants and invertebrates of national significance.

### Effects of the Telford & Wrekin Draft Local Plan 2015

- 3.14 A key element of the Draft Local Plan is the delivery across the plan area of 15,552 new dwellings and a minimum of 110 ha of new employment land over the life of the plan up to 2031. Housing, employment and infrastructure development has the potential to generate a range of environmental impacts which can, (depending on their nature, magnitude, location and duration), have effects on European sites. A summary of the types of impacts and effects that can arise from these types of development is provided in the Table below.

**Table 3.1: Housing, Employment and Infrastructure Development: Summary of Impacts and Effects on European Sites**

Effects on European Sites	Impact Types
Habitat (& species) fragmentation and loss	<ul style="list-style-type: none"> <li>■ Direct land take, removal of green/ connecting corridors/ supporting habitat, changes to sediment patterns (rivers and coastal locations)</li> <li>■ Introduction of invasive species (predation)</li> </ul>
Disturbance	<ul style="list-style-type: none"> <li>■ Increased recreational activity (population increase)</li> </ul>

<sup>5</sup> Natural England (2014) West Midland Mosses SAC Site Improvement Plan.

Effects on European Sites	Impact Types
	<ul style="list-style-type: none"> <li>■ Noise and light pollution (from development and increased traffic)</li> </ul>
<b>Changes to hydrological regime/ water levels</b>	<ul style="list-style-type: none"> <li>■ Increased abstraction levels (new housing)</li> <li>■ Increased hard standing non-permeable surfaces/ accelerated run-off</li> <li>■ Laying pipes/ cables (surface &amp; ground)</li> <li>■ Topography alteration</li> </ul>
<b>Changes to water quality</b>	<ul style="list-style-type: none"> <li>■ Increase in run-off/ pollutants from non-permeable surfaces (roads, built areas)</li> <li>■ Increased air pollution (eutrophication) (traffic, housing)</li> <li>■ Increased volume of discharges (consented)</li> </ul>
<b>Changes in air quality</b>	<ul style="list-style-type: none"> <li>■ Increased traffic movements</li> <li>■ Increased emissions from buildings</li> </ul>

3.15 The first stage in the screening process considered the potential impacts (Table 3.1 above) arising as a result of the policies and whether these have the potential to lead to likely significant effects (LSE). The screening identified five Draft Local Plan Policies for which the impacts could potentially lead to significant effects (Appendix III) alone or in-combination with each other. The policies and their potential impacts are provided in the Table below.

**Table 3.2: Telford and Wrekin Draft Local Plan Policies identified as having impacts that could lead to LSE**

Policy/ Allocation	Potential impacts of the Policy/ Allocation
<b>SP1 – Telford</b>	<p>The policy sets the town of Telford as the main focus for the majority of development needs over the Plan period, and identifies land to deliver approximately 13,313 new homes in Telford up to 2031 (including a number of strategic extensions to the town that the Council considers are appropriate for development). The policy also supports the delivery of approximately 110 hectares of new employment land up to 2031, retaining the towns existing role of Principle Service Centre in the borough. The delivery of housing and employment development has the potential to result in:</p> <ul style="list-style-type: none"> <li>■ Atmospheric pollution through increased traffic, which could reduce air quality.</li> <li>■ Increased levels of disturbance through recreational activity, noise and light pollution.</li> <li>■ Increased levels of abstraction, surface water runoff and sewerage discharge, which could reduce water levels and quality.</li> </ul>
<b>SP2 – Newport</b>	<p>The policy supports the role of the Newport area as a Market Town, planning for approximately 10 hectares of additional employment land, and housing development limited to that required to meet local needs; identified as approximately 1,182 new homes up to 2031. Sites over and above those committed or identified in the Plan will be prioritised on</p>

Policy/ Allocation	Potential impacts of the Policy/ Allocation
	<p>previously developed sites within the town. Though the policy seeks to respect and enhance the quality of the towns natural environment, the delivery of housing and employment has the potential to result in:</p> <ul style="list-style-type: none"> <li>■ Atmospheric pollution through increased traffic, which could reduce air quality.</li> <li>■ Increased levels of disturbance through recreational activity, noise and light pollution.</li> <li>■ Increased levels of abstraction, surface water runoff and sewerage discharge, which could reduce water levels and quality.</li> </ul>
<b>SP3 – Development in the Rural Area</b>	<p>The policy restricts development in the rural area to that required to meet local needs, identified as 902 new homes up to 2031. The policy also adopts a preference for the re-use of previously developed land in sustainable locations. Although the policy and mitigation provided through the Plan should help to ensure the protection of the natural environment, the delivery of housing through this policy has the potential to act in-combination with other policies resulting in:</p> <ul style="list-style-type: none"> <li>■ Atmospheric pollution through increased traffic, which could reduce air quality.</li> <li>■ Increased levels of disturbance through recreational activity, noise and light pollution.</li> <li>■ Increased levels of abstraction, surface water runoff and sewerage discharge, which could reduce water levels and quality.</li> </ul>
<b>EC1 - Employment site allocations policy</b>	<p>The policy identifies the provision of a minimum of 110 ha of new employment land during the life of the plan. It also proposes preferred locations for this growth in Appendix C and on the policies map. The delivery of 110 ha of new employment land has the potential to result in:</p> <ul style="list-style-type: none"> <li>■ Atmospheric pollution through increased traffic, which could reduce air quality.</li> <li>■ Increased levels of disturbance through recreational activity, noise and light pollution.</li> <li>■ Increased levels of abstraction, surface water runoff and sewerage discharge, which could reduce water levels and quality.</li> </ul> <p>None of the employment allocations proposed in Appendix C were considered likely to have LSEs alone given their distance from European sites. The potential for in-combination effects for the overall level of proposed growth will considered in further detail.</p>
<b>HO1 – Housing Requirement</b>	<p>The policy makes provision for the delivery of at least 15,552 new dwellings across the borough up to 2031 (individual sites are considered within Policy HO2). The policy is likely to result in development in the borough and intensification in some areas, with the potential to result in:</p> <ul style="list-style-type: none"> <li>■ Atmospheric pollution through increased traffic, which could reduce air quality.</li> </ul>

Policy/ Allocation	Potential impacts of the Policy/ Allocation
	<ul style="list-style-type: none"> <li>■ Increased levels of disturbance through recreational activity, noise and light pollution.</li> <li>■ Increased levels of abstraction, surface water runoff and sewerage discharge, which could reduce water levels and quality.</li> </ul> <p>It should be noted that the majority of the development proposed through this policy is either completed (3,243 dwellings) or already has planning permission (8,339 dwellings).</p>

3.16 The five Draft Local Plan Policies and their potential impacts were then screened against each of the European sites scoped into the HRA (Appendix IV). This included consideration of the environmental pathways and sensitivities of the sites, as well as mitigation provided by Draft Local Plan Policies. Appendix III and IV detail the results of the HRA screening process for the Draft Local Plan, the key findings are summarised below.

#### **Screening Assessment for the Draft Local Plan**

- 3.17 HRA screening good practice combines both a plan and a European site focus. The policy screening removes from consideration, those elements of the plan unlikely to have effects on European sites. The remaining five plan elements (summarised above) can then be considered in more detail for their impacts on European sites. The site focus considers the impacts and potential effects identified through the policy screening, in the light of the environmental conditions necessary to maintain site integrity for the European sites scoped into the assessment.
- 3.18 Table 3.3 considers the potential impacts (Table 3.2) arising from the Draft Local Plan Policies (Appendix III) against the identified European sites (Appendix IV) to determine if there is the potential for likely significant effects. Table 3.4 provides the key to Table 3.3 to describe the results of the assessment.

**Table 3.3: HRA Screening Summary**

	Potential Likely Significant Effects					
	Air Quality		Disturbance		Water Levels & Quality	
European sites	A <sup>6</sup>	IC <sup>7</sup>	A	IC	A	IC
Cannock Chase SAC	No	No	No	No	No	No
Midland Meres and Mosses (Ramsar – Phase 1)	No	No	No	No	No	No
Midland Meres and Mosses (Ramsar – Phase 2)	No	No	No	No	No	No
Mottey Meadows SAC	No	No	No	No	No	No
Severn Estuary SAC/ SPA/ Ramsar	No	No	No	No	No	No
West Midlands Mosses SAC	No	No	No	No	No	No

**Table 3.4: Screening Summary Key**

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

### **Air Quality**

- 3.19 For all of the European sites it was assessed that there would be no significant effects as a result of the Plan alone through increased short range pollution as there are no existing pathways. Development will not result in a significant increase in traffic along any major roads that are within 200m of the European sites.
- 3.20 While development proposed through the Plan area could contribute to long-range diffuse atmospheric pollution it was considered that the contribution is unlikely to be of significance. The reality of the situation is that the majority of housing development proposed through the Plan

<sup>6</sup> AA required alone?

<sup>7</sup> AA required in combination?

is either already completed (3,243 dwellings from 2011 to 2015) or currently has planning permission (9,310 dwellings). Given the mitigation provided through Draft Local Plan Policies below, it is considered that the contribution of the plan is unlikely to be of significance and be less than 1% of the minimum critical loads or levels alone for nitrogen at the European sites. Draft Local Plan policies seek to protect air quality and minimise the impacts of increased atmospheric pollution and traffic:

- EC4 - Hierarchy of Centres - focuses the majority of development within existing centres with; good access to more sustainable modes of transport, and increased accessibility to promote more cycling and walking.
- NE5 - Biodiversity and Geodiversity Assets - Protects and enhances valued assets, development must consider its impact on biodiversity and geodiversity assets, allowing for appropriate buffer zones, and enhancing conditions for priority habitats and species.
- NE6 - Trees, Hedgerows and Woodlands - managing and protecting existing assets and restricting felling. Supports improved air quality.
- C1 - Promoting alternatives to the car - promoting more sustainable modes of transport and increased accessibility to promote more cycling and walking.
- C3 - Impact of development on Highways - seeks to manage and mitigate the impact of development on highways, managing congestion and atmospheric pollution.
- BE1 - Urban Design - promotes design that encourages walking and cycling and efficient energy consumption.
- ER1 - Renewable Energy - promoting cleaner energy generation and consumption.

3.21 The Council is proposing a comprehensive mitigation strategy to address the individual and cumulative impacts of proposed development on traffic. It is seeking a plan rather than project level approach to address the impacts of development on the highways network, which will help to ensure that the cumulative impact of all the development proposed is appropriately addressed. This is in line with the Telford & Wrekin Local Transport Plan<sup>8</sup>, which seeks to employ a plan led approach for new developments to mitigate any transport impacts. To help guide this approach, the Council has developed a Transport Mitigation Strategy, which sets out the strategic impact of proposed development on the transport system and proposes different ways to mitigate the potential impact<sup>9</sup>. This along with Draft Local Plan Policies that seek to improve connectivity and enhance access to sustainable transport modes as well as facilities/services should help to reduce the need to travel by private car with long term positive effects on air quality.

---

<sup>8</sup> Telford & Wrekin Council (2011) Local Transport Plan 2011-2026.

<sup>9</sup> Prepared by Pell Frischman on behalf of Telford & Wrekin Council (Feb 2015) Telford Future – Shaping Places. Shaping Places Report. Draft Final.

- 3.22 It is considered that the mitigation provided through plan policies above and available at the project level will ensure that there are no significant adverse impacts on air quality. It is important to note that there are no significant existing issues with regard to air quality within the borough, with National Air Quality Objectives being achieved. Given the points above it is considered that the plan will not have LSEs on European sites either alone or in-combination as a result of increased diffuse atmospheric pollution.

### **Disturbance**

- 3.23 The screening considered that there is the potential risk for recreational disturbance at three of the European sites; Cannock Chase SAC, Mottley Meadows SAC and Midland Meres and Mosses Ramsar (Phase 2).
- 3.24 Evidence suggests that recreational activities at the Cannock Chase SAC are having adverse impacts. A mitigation strategy has been produced to address this issue and it proposes the collection of developer contributions from all housing development within 15km of the SAC<sup>10</sup>. The evidence supporting this work, including a visitor survey, suggests that the majority of visitor trips (75%) originate from within 15km of the SAC. The screening considered that given the SAC is approximately 20km from the Plan boundary it is not likely to have significant effects alone as a result of increased recreational activity alone. While development could act in-combination with other plans and programmes, the screening considered that this contribution is not likely to be of significance given the mitigation provided through Draft Local Plan Policies set out below:
- EC4 - Hierarchy of Centres - focuses development in existing centres where there are more local recreation opportunities.
  - NE1, NE2 and NE3 - Green Infrastructure / Green Network - protecting and enhancing local and strategic open space needs as well as the requirement for new development to contribute to the provision and enhancement of new and existing open space and recreational facilities.
  - NE5 - Biodiversity and Geodiversity Assets - protecting, maintaining and enhancing valued habitats and species, supporting local assets and the recreational values that they hold.
  - NE7 - Existing Public Open Space - protecting and maintaining local open space provisions that provide local sport and recreational opportunities.
  - NE8 - Provision of public open space - requires new development to provide and/or contribute to the provision of useful and functional open space.
  - COM1 - Social Infrastructure - restricting development that affects existing community infrastructure and local recreational facilities.

---

<sup>10</sup> Underhill-Day, J. & Liley, D. (2012). Cannock Chase Visitor Impacts Mitigation Report. Footprint Ecology. Unpublished report.

- 3.25 The screening concluded that the Draft Local Plan will not have likely significant effects either alone or in-combination on the Cannock Chase SAC as a result of increased recreational disturbance.
- 3.26 Mottey Meadows SAC lies approx 5km to the east of the Plan boundary. While the qualifying features of the SAC are vulnerable to the impacts of recreational activity the recent Site Improvement Plan prepared by NE does not indicate that this is currently an issue<sup>11</sup>. Taking this into account, the screening considered that the mitigation provided through Draft Local Plan Policies (set out above), in particular the provision of green infrastructure (Policies NE1 to 3) and public open space (NE8), will ensure that proposed development will not have likely significant effects either alone or in-combination on the Mottey Meadows SAC through increased recreational activity.
- 3.27 A component site of the Midland Meres and Mosses Ramsar (Phase 2) is situated to the north east of Newport, approximately 500m from the boundary of the Plan area. Development within the Plan area, particularly in and around Newport, has the potential to increase recreational activities at the site. It should be noted that only a small proportion of the overall level of growth is directed towards Newport (1,182 new dwellings and 10 ha of new employment land) and this is located in the south of the town away from the European site. It is worth noting again that the majority of housing development proposed through the Plan is either already completed (3,243 dwellings from 2011 to 2015) or has planning permission (9,310 dwellings). The screening determined that the site allocations in Newport alone are unlikely to result in significant effects alone given the scale of proposed development and location to the south of Newport.
- 3.28 Given that only a small proportion of development is directed towards Newport and this is to the south of the town away from the SAC, it is considered unlikely that the Draft Local Plan will have significant effects on the Ramsar through increased recreation. Mitigation provided through Draft Local Plan Policies (set out above), in particular the provision of green infrastructure (Policies NE1 to 3) and public open space (NE8), will ensure that proposed development will not have likely significant effects either alone or in-combination on the Midland Meres and Mosses Ramsar (Phase 2) through increased recreational activity.

### **Water Quality**

- 3.29 As all of the European sites lie outside the Plan area it is considered that impacts are most likely to occur through the provision of new homes and resulting increased pressure on sewerage capacity.
- 3.30 Severn Trent Water provides wastewater and sewerage services across the borough with a number of Waste Water Treatment Works (WwTW) serving various catchments within the plan area. A Detailed WCS was

---

<sup>11</sup> <http://publications.naturalengland.org.uk/publication/6519033218203648>

produced in 2014 that examined nine WwTWs that serve areas in which strategic growth was being planned in the borough<sup>12</sup>. It found that the overall level of constraint, taking into account current ecological status under the WFD, for the nine WwTWs is as follows:

- Very high for the Newport, Coalport, Waters Upton and Crudgington WwTWs;
- Moderate to high for the Rushmoor and High Ercall WwTWs;
- Moderate for the Edmond and Sambrook WwTWs; and
- Low for the Monkmoor WwTW.

3.31 It concluded that wastewater treatment capacity is the main environmental and infrastructure constraint to growth in the plan area. Telford is the main focus for growth in the borough (Policy SP1) during the life of the plan. This will result in the majority of development falling within the catchments for the Coalport and Rushmoor WwTWs, which eventually discharge into the River Severn. The evidence suggests that there is capacity across the existing WwTWs serving towns in the borough to support the level of growth set out in the Plan (Policies HO1 and EC1); however, this capacity does not align with the spatial strategy set out in the Draft Local Plan. Based on the findings of the WCS, it appears that there is currently not enough capacity at the majority of WwTWs to accommodate the level of growth proposed. However, it should be noted that through the work undertaken for the WCS, Severn Trent Water confirmed that there will be capital maintenance work and, as required, capacity increase at WwTWs to cater for future growth<sup>13</sup>. There are ongoing improvements to Rushmoor WwTWs that when completed in 2016 will result in it operating 65% under capacity<sup>14</sup>. It should also be noted that the Detailed WCS also considered a higher level of growth (20,000 new dwellings) than is currently being proposed through the Draft Local Plan.

3.32 Policy ER 11 seeks to avoid adverse impacts of additional demand on the foul sewerage network and expects developers to demonstrate the following:

- How foul flows produced by the development will be drained and identification of the agreed point of connection to the public foul sewerage network;
- How development will be phased to allow Severn Trent Water sufficient time to undertake any necessary capacity improvement works to the public foul network or to existing waste water treatment works prior to construction and occupation of developments; and
- How any development adjacent to water bodies covered by the Water Framework Directive will contribute towards those water

---

<sup>12</sup> Telford and Wrekin Council (2014) Detailed Water Cycle Study Final Report.

<sup>13</sup> Ibid.

<sup>14</sup> [http://www.waterprojectsonline.com/case\\_studies/2013/Severn\\_Trent\\_Rushmoor\\_2013.pdf](http://www.waterprojectsonline.com/case_studies/2013/Severn_Trent_Rushmoor_2013.pdf)

bodies maintaining or achieving Good Ecological Status. This may take the form of on-site measures, a financial contribution to off-site measures or where viable seeking a more appropriate location for development.

- 3.33 The phasing of growth will be key to ensuring that the necessary improvements to WwTWs and the sewerage network can be made to provide sufficient capacity. The supporting text of Policy ER 11 acknowledges this and states that strategically phasing development across the course of the plan will allow Severn Trent Water and other statutory undertakers to incorporate improvements into Asset Management Plans delivering key infrastructure in advance of development. It also states that regular reviews of the Infrastructure Delivery Plan will also help provide Severn Trent Water with information on any changes to the phasing of development in a more timely fashion allowing opportunities to re-deploy resources to better meet the needs of emerging development patterns. To help strengthen the plan, it is recommended that Policy ER 11 is linked to the phasing of proposed development set out in Policy HO3. The Council is intending to take a plan rather than development led approach with regard to water quality, allowing the Council, Severn Trent Water and the EA to assess any potential water quality issues in advance of applications and develop appropriate mitigating measures.
- 3.34 Draft Local Plan Policy ER 12 relates to the effective on-site management of surface water and expects developers to provide detailed schemes for the management of surface water runoff as well as criteria for the provision of Sustainable Urban Drainage Systems. The Policy also expects developers to ensure that discharge locations have capacity to receive all foul and surface water discharge from developments. Any development that is adjacent to a surface water body or providing new features as part of development, developers must ensure they are multi-functional and enhance the hydrology, ecological, visual and recreational value of the water body.
- 3.35 The screening concluded that existing regulatory processes, such as discharge licensing (including EA Review of Consents) and the WFD, as well as mitigation provided through Draft Local Plan Policies, should ensure that there are no likely significant effects on European sites through reduced water quality as a result of increased discharge. This matter will need to be monitored carefully to ensure that there is sufficient capacity at WwTWs for proposed growth and that potential impacts on water quality are minimised.

### **Water Levels**

- 3.36 Development proposed in Draft Local Plan has the potential to have negative effects on water resources through increased abstraction. The borough primarily falls within the Shelton Water Resource Zone (WRZ) and Whitchurch and Wren WRZ. The spatial strategy set out in the Draft Local Plan will result in the majority of growth proposed being

located within the Shelton WRZ. The Severn Trent Water Resource Management Plan<sup>15</sup> (WRMP) identifies that the supply in the Shelton WRZ is due to suddenly decline in 2024/25 in response to license revocations to meet environmental (river) flow requirements. The River Worfe and some of its tributaries are impacted by low flows, principally caused by over-abstraction of the underlying aquifer for public supply.

- 3.37 The WRMP seeks to address this issue and increase the volume of water available for supply through a number of measures, which include pipeline upgrades to transfer additional water from the west part of the Shelton zone to the east and increasing abstraction at the Uckington borehole. However, it should be noted that this is dependent on ongoing discussion with the EA as it would involve increased groundwater abstraction from an area where groundwater is already over licenses and over abstracted. A Detailed Water Cycle Study<sup>16</sup> (WCS) produced by the Council states that a secure supply-demand balance also depends on demand not exceeding the forecasted level of growth within the WRMP. Telford is one of just three main urban areas in the Shelton WRZ; therefore, its growth rates have the potential to affect the balance between supply and demand.
- 3.38 As is the case nationally, the evidence demonstrates that increased pressure on water resources is a key issue for the borough and surrounding areas. The WCS recommends that per capita consumption across the borough needs to be effectively managed to a level of around 110 litres per person per day. It also encourages the Council to take opportunities to promote Severn Trent Water's free metering programme and water efficiency advice to residents across the borough. It is important to note that the Detailed WCS considered a higher level of growth (20,000 new dwellings) than is currently being proposed through the Draft Local Plan.
- 3.39 The Draft Local Plan seeks to promote water sensitive design in new development in order to make a positive contribution to the security of water supplies in the Shelton WRZ. Policy ER 10 expects developers on schemes of 10 or more homes or 1,000 sqm of non-housing to demonstrate that they have incorporated design features that will reduce water consumption and supporting the recycling/ re-use of water through measures such as rainwater harvesting and grey water recycling. It also expects them to demonstrate that they provide features for the collection of rainwater for use in irrigation / watering to offset potable water demand.
- 3.40 Given the current regulatory process in place, such as the WRMP and EA Review of Consents, as well as mitigation provided by Draft Local Plan Policies, it is considered unlikely that there will be significant effects alone or in-combination on the European sites through increased

---

<sup>15</sup> Severn Trent Water (2014) Final Water Resource Management Plan. Available online: <http://www.severntrent.com/future/future-plans-and-strategy/water-resources-management-plan>

<sup>16</sup> Telford and Wrekin Council (2014) Detailed Water Cycle Study Final Report.

abstraction. While not essential to the finding of no likely significant effect, in line with the Detailed WCS, it is recommended that as a minimum Draft Local Plan Policy ER 10 should require developers to demonstrate that water consumption in the development will be managed at a level of 110 litres per person per day. While it is acknowledged that the Detailed WCS considered a higher level of growth than is currently proposed in the Draft Local Plan, a precautionary approach should be taken to allow for flexibility in the Plan, should the overall level of growth need to increase in the future as a result of new or updated evidence. It is also recommended that Policy ER 10 is linked to the phasing of proposed developed set out in Policy HO 3. The phasing of development will be a key factor in helping to ensure a secure supply-demand balance.

### Screening of the Local Plan Publication Version

- 3.41 The Draft Local Plan was subject to HRA Screening with the findings informing the development of the Draft Local Plan. A HRA Screening Report (July 2015) accompanied the Draft Local Plan on public consultation from 03 August to 25 September 2015. No comments were received in relation to the HRA. As a result of responses received on the Draft Local Plan the Council has made a number of changes to the Plan in preparation for Publication stage (Regulation 19). It is important that these changes are screened to determine if they significantly affect the findings of the previous HRA work presented earlier in this Section.
- 3.42 The changes to the Plan since the Draft Plan (Regulation 18) stage have been screened for significance with regard to the HRA work, which is presented in Appendix V of this Report. The screening found that the majority of changes are minor and do not significantly affect the findings of the previous HRA work as they seek to provide further clarification or avoid repetition. This includes the deletion of some policies and merging of others. It is therefore concluded that the Local Plan Publication Version will not have likely significant effects on any European sites either alone or in-combination. For reference, the policy number changes are summarised in the table below.

**Table 5.1: Summary of Policy Number Changes Following Consultation 2015**

Draft Local Plan (Reg 18)	Local Plan Publication Version (Reg 19)
NE 1 Provision of green infrastructure	Policy deleted
C 4 strategic and primary road networks	Policy deleted
EC 12 Leisure, cultural and tourism development & EC 13 Tourist accommodation	Policies merged - now EC 12 Leisure, cultural and tourism development
EC 7 Shopping centre design	EC 10 Shopfront and advertisement design

EC 8 Evening and night-time economy	EC 9 Evening and night time economy
EC 9 Community life	EC 7 Local Centres and rural services
EC 10 Out of town and edge of centre development	EC 8 Out of centre and edge of centre development
C 5 Design of roads and streets	C 4 Design of roads and streets
C 6 Design of cycle and car parking	C 5 Design of parking
C 7 Commuted parking payments	C 6 Commuted parking payments
C 8 Enhancing communication networks	C 7 Enhancing communication networks
C 9 New telecommunications development	C 8 New telecommunications development
NE 2 Management and maintenance of green infrastructure	NE 5 Management and maintenance of public open space
NE 3 Green Network	NE 6 Green Network
NE 4 Strategic Landscapes	NE 7 Strategic Landscapes
NE 5 Biodiversity and geodiversity	NE 1 Biodiversity and geodiversity
NE 6 Trees, hedgerows and woodlands	NE 2 Trees, hedgerows and woodlands
NE 7 Existing public open space	NE 3 Existing public open space
NE 8 Provision of public open space	NE 4 Provision of public open space
BE 3 Buildings of Local Interest	BE 4 Listed buildings
BE 4 Parks and gardens of historic interest	BE 6 Buildings of local interest
BE 5 Conservation Areas	BE 7 Parks and gardens of historic interest
BE 6 Ironbridge Gorge World Heritage Site	BE 5 Conservation Areas
BE 7 Archaeology and Scheduled Ancient Monuments	BE 3 Ironbridge Gorge World Heritage Site

## 4.0 HRA CONCLUSIONS

- 4.1 This report outlines the methods used and the findings arising from the HRA Screening for the Telford & Wrekin Local Plan. The HRA of the Plan has been undertaken in accordance with available guidance and good practice and has been informed by the previous HRA screening work and findings produced for earlier iterations of the Plan, as well as advice received from Natural England.
- 4.2 The Local Plan proposes the delivery of 15,555 new dwellings and a minimum 76 ha of new employment land across the borough up to 2031. The Plan focuses the majority of this growth in Telford (13,313 new homes and 110 ha of new employment land) with some development also being directed towards Newport (1,182 new homes and 10 ha of new employment land) and the rural areas (902 new dwellings). It is important to note that the majority of housing development proposed through the Plan is either already completed (3,243 dwellings from 2011 to 2015) or currently has planning permission (9,310 dwellings).
- 4.3 The screening of the Draft Local Plan identified five policies for which the impacts could potentially lead to significant effects either alone, or more likely in-combination. The five policies and their potential impacts were then screened against each of the eight European sites scoped into the HRA. This included consideration of the environmental pathways and sensitivities of the sites, as well as mitigation provided by Draft Local Plan Policies.
- 4.4 The screening found that the Draft Local Plan is not likely to have significant effects either alone or in-combination on any European sites as a result of short or long range (diffuse) atmospheric pollution. Proposed development will not significantly increase traffic on any major roads within 200 m of a European site and the mitigation provided through Draft Local Plan Policies, including a comprehensive mitigation strategy for traffic, will ensure that the Plan will not significantly contribute to diffuse pollution and therefore atmospheric deposition at European sites.
- 4.5 The screening also found that the Draft Local Plan is not likely to have significant effects either alone or in-combination on any European sites as a result of increased recreational disturbance. All of the European sites lie outside the Plan area and given the distribution of development and mitigation provided through Draft Local Plan Policies, in particular the provision of green infrastructure and new public open space, it is considered unlikely that proposed development will significantly increase recreational activity at any of the European sites.
- 4.6 It was also determined that the Draft Local Plan is not likely to have significant effects either alone or in-combination on any European sites as a result of increased abstraction or sewerage discharge. Existing

regulatory processes - such as abstraction and discharge licensing (including EA Review of Consents), Water Resource Management Plans and the Water Framework Directive - as well as mitigation provided through Draft Local Plan policies, should ensure that there are no likely significant effects on European sites by ensuring there is sufficient water resources available as well as capacity at Waste Water Treatment Works.

- 4.7 While not essential to the findings of no likely significant effect, in line with the Detailed Water Cycle Study, the screening recommended that as a minimum, Draft Local Plan Policy ER 10 should require developers to demonstrate that water consumption in the development will be managed at a level of 110 litres per person per day. This would allow for flexibility in the Plan, should the overall level of growth need to increase in the future as a result of new or updated evidence. It is also recommended that Policy ER 10 is linked to the phasing of proposed developed set out in Policy HO 3. The phasing of development will be a key factor in helping to ensure sufficient water resource and sewerage capacity.
- 4.8 Following the consultation on the Draft Local Plan, the Council made a number of changes to the Plan. These changes were screened and found to not significantly affect the findings of the HRA Screening for the Draft Local Plan. It was therefore concluded that the Local Plan Publication Version is not likely to have significant effects on any European sites either alone or in-combination.

### **Consultation and Further Work**

- 4.9 These findings will be subject to further consultation comments and advice from NE and wider stakeholders alongside the Local Plan Publication Version. HRA is an iterative process and further work will be undertaken alongside the Shaping Places Local Plan to inform its development.
- 4.10 The findings of this plan level HRA do not obviate the need to undertake HRA for lower level, project scale/ implementation plans where there is potential for significant effect on one or more European sites. The findings of this HRA should be used to inform any future assessment work.

**APPENDICES** *(provided separately)*

- I European Site Characterisations
- II Plans, Programmes and Projects Review
- III Draft Local Plan Policy Screening
- IV European Site Screening
- V HRA Screening of Local Plan Changes