

Shropshire Council

Local Plan Review 2016 - 2036

**Preferred Strategic Sites**

**Habitats Regulations  
Assessment**

**Screening Report**

July 2019

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## **1. Introduction**

- 1.1. It is a legal requirement for Local Authorities to prepare a Habitats Regulations Assessment (HRA) for plans and projects which have the potential to impact on habitats of European importance.
- 1.2. This Preferred Strategic Sites HRA Screening Report is the fourth phase of the HRA of the Shropshire Council Local Plan Review (LPR) 2016-2036. It should be noted that the LPR is still in the process of preparation.
- 1.3. The Issues and Strategic Options document was published for public consultation between 23rd January and 20th March 2017. This set out options for the level and general distribution of housing growth and for economic growth, and was accompanied by the HRA Initial Screening Report.
- 1.4. The Preferred Options: Scale and Distribution of Development consultation document was published for consultation between 27th October and 22nd December 2017. It set out the preferred scale and distribution of housing and employment development in Shropshire 2016-36, identifying a settlement hierarchy of a Strategic Centre, Principal Centres, Key Centres, Community Hubs and Community Clusters. It also proposed draft policies for the management of development within Community Hubs and Community Clusters. It was accompanied by the HRA Screening Report Preferred Options Scale and Distribution of Development.
- 1.5. The Preferred Sites consultation document was published for consultation between 29th November 2018 and 8th February 2019. This identified preferred sites in the Strategic Centre, the Principal and Key Centres and Community Hubs for housing and employment use. It included the numbers of dwellings and the amount of employment land (in hectares) for each site. It also asked for comments on a cross subsidy exception sites policy. It was accompanied by the Preferred Sites Habitats Regulations Assessment Screening Report.
- 1.6. The current strategic sites consultation document identifies three preferred strategic sites and asks for views on whether a fourth potential strategic site should be preferred. Strategic sites are individually more than 25ha in size and are not associated with meeting the needs of those settlements in the preferred sites document. Two brownfield sites (the former Ironbridge Power Station and Clive Barracks at Tern Hill) are proposed for mixed use development, whilst a third (RAF Cosford) would offer increased employment, education opportunities and housing to meet the needs of RAF personnel. The potential strategic site at Junction 3 of the M54 would provide employment and housing

- 1.7. A review of policies in the adopted Local Plan has not yet been undertaken: this will be published later in the plan making process and will form the basis for subsequent HRA reports.
- 1.8. The purposes of this HRA Screening Report are to
  - identify which international sites could possibly be affected by the proposals in the Strategic Sites consultation document and which can be screened out at this stage,
  - determine potential pathways by which the international sites may be affected,
  - to give recommendations for any potential avoidance or mitigation measures to be considered when drafting planning policies for later LPR documents,
  - comment on requirements for further information gathering.
- 1.9. A summary of this HRA Screening Report (the Preferred Strategic Sites Habitats Regulations Assessment Screening Report Summary) is also available on Shropshire Council's website.

### **What are Habitats Regulations Assessments?**

- 1.10. Habitats Regulations Assessment (HRA) (required under the Conservation of Habitats and Species Regulations 2010 or the 'Habitats Regulations') plays an important role in protecting the conservation objectives of the Natura 2000 network of sites. These sites, often referred to as 'European Sites', include Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Candidate SACs (cSACs). Following UK government policy, potential SPAs (pSPAs), possible SACs (pSACs) and proposed and listed Wetlands of International Importance (Ramsar Sites) designated under the Ramsar Convention are also treated as though covered by the Habitats Regulations. The term 'international sites' includes all the above designations and is used throughout this report.
- 1.11. The purpose of a HRA is to ensure that the proposals of any plan or project, or the cumulative effect of a number of plans or projects, will not adversely affect the integrity of any international site.
- 1.12. The 'integrity' of the site is defined in ODPM Circular 06/2005: (Biodiversity and Geological Conservation – Statutory Obligations and their impact within the Planning System) as "the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or levels of populations of species for which it was classified".
- 1.13. European guidance (EU 2001) describes a four stage process to HRA and is summarised below:

**Table 1: Stages of HRA process**

**Stage 1: Screening**

The process to identify the likely impacts of a policy or proposal upon a Natura 2000 site, either alone or in combination with other plans and projects, and consider whether the impacts are likely to be **significant** or uncertainty exists. Previously, case law suggested straightforward counter-acting measures could be recommended for incorporation into policy wordings and then sites re-screened. However, recent case law (*People Over Wind v Coillte Teoranta C-323/17*) has indicated that this is not acceptable and if mitigation measures are required, HRA screening should proceed immediately to Stage 2.

**Stage 2: Appropriate assessment**

Consideration of impacts on the **integrity** of the Natura 2000 sites, either alone or in combination with other plans and projects, with regard to the site's structure and function and its conservation objectives. Where there are adverse impacts, an assessment of mitigation options is carried out to determine adverse effect on the integrity of the site. If these mitigation options cannot avoid adverse effects then proceed to stage 3.

**Stage 3: Assessment of alternative solutions**

Examining alternative ways of achieving the objectives of the policy or proposal to establish whether there are solutions that would avoid or have a lesser effect on Natura 2000 sites.

**Stage 4: Assessment where no alternative solutions remain and where adverse impacts remain:**

This is the assessment where no alternative solution exists and where adverse impacts remain. The process to assess whether the development is necessary for imperative reasons of overriding public interest (IROPI) and, if so, the potential compensatory measures needed to maintain the overall coherence of the site or integrity of the European site network

**Background to the Shropshire Local Plan Review 2016-2036 and the HRA Screening Reports**

- 1.14. The Shropshire Local Plan currently comprises the Core Strategy (adopted 2011) and the Site Allocations and Management of Development (SAMDev) Plan (adopted 2015), together with the adopted Neighbourhood Plans for Much Wenlock and Shifnal. These documents set out proposals for the use of land and policies to guide future development in order to help to deliver sustainable growth in Shropshire for the period up to 2026.

This Local Plan is now being reviewed, in line with the recommendations of the Inspector for the SAMDev Plan. The overall strategic approach of focusing growth in Shropshire's Strategic Centre, Principal Centres and Key Centres whilst enabling some controlled development in rural areas to maintain local sustainability remains the preferred development strategy.

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Many of the existing policies in the Core Strategy and SAMDev do not need to be amended and will be carried forward as part of the new Plan. The review will therefore focus on key areas of change, including options for the level and distribution of new housing and strategies for employment growth during the period 2016 - 2036, together with any amended policies and new site allocations which are needed to demonstrate that these requirements can be delivered. The existing Core Strategy and SAMDev Plan will remain in force until any new Plan is adopted. This is anticipated around 2021.

- 1.15. The product of the review will be a new Local Plan document which merges the Core Strategy and SAMDev Plans and contains both strategic policies and more applied policies which primarily inform planning decisions, together with existing (unimplemented) sites and new site allocations.
- 1.16. This fourth HRA Screening Report relates to the Shropshire Local Plan Review: Preferred Strategic Sites document published for consultation on 1st July 2019.
- 1.17. The Local Plan Review (LPR) is not directly connected with or necessary to the management of an international site (Habitats Regulations 63(1)(b)).

## **2. Methodology**

### **Purpose of the HRA Screening Report**

- 2.1. This Screening Report seeks to:
- identify which international sites could possibly be affected by development on sites in the LPR strategic sites consultation document,
  - identify the potential pathways by which the sites may be affected,
  - Identify all aspects of the LPR strategic sites which would have no effect on an international site, so that that they can be eliminated from further consideration in respect of this and other plans;
  - identify all aspects of the LPR strategic sites which would not be likely to have a significant effect on an international site (i.e. would have some effect, but minor residual), either alone or in combination with other aspects of the same plan or other plans or projects. At this stage, mitigation measures are not considered;
  - identify those aspects of the LPR strategic sites where it is not possible to rule out the risk of significant effects on an international site, either alone or in combination with other plans or projects, in the absence of mitigation measures. A full Appropriate Assessment will be required for these sites. Where there is a lack of sufficient detail at the preferred strategic sites stage, consideration will be deferred to the next stages of the LPR where the results of commissioned research and policy wording will be known, and
  - where possible, make recommendations on areas of further research required to inform the next stages of the HRA, signposting sites which will be particularly sensitive to development and recommending potential avoidance or mitigation measures to be considered including in policy wording.

### **Identification of international sites requiring consideration**

- 2.2. This HRA Screening Report should be read in conjunction with the Shropshire LPR Preferred Sites Habitats Regulations Assessment Screening Report (November 2018) and the Shropshire Site Allocation and Management of Development Plan Habitats Regulations Assessment (July 2014). These HRA Reports identified international sites in and around Shropshire (together with their designated features and conservation objectives), which could potentially be impacted by proposed plans or projects in the County.
- 2.3. Following the precautionary principle, the first step in the screening process was to identify all international sites in Shropshire and within 15km of the county boundary. This figure was chosen as a starting point as the largest screening buffer identified in the literature for negative effects was 15km (recreational effects on Cannock Chase). Additional sites were added to the screening by considering possible longer distance

pathways e.g. river SACs downstream of Shropshire, and through consultation with Natural England and Natural Resources Wales.

- 2.4. All international sites identified for consideration in the LPR can be found on Map 1 in Appendix 1 of the Preferred Sites HRA Screening Report (2018) <https://shropshire.gov.uk/media/11409/habitats-regulations-assessment-report-appendix-1.pdf>

### **Collation of information on international sites**

- 2.5. Details of the international sites, their reasons for designation, conservation objectives and vulnerabilities can be found in Appendix 2 of the Preferred Sites HRA Screening Report (2018) <https://shropshire.gov.uk/media/11332/habitat-regulations-assessment-report-preferred-sites.pdf> The SSSI's within the Midland Meres and Mosses Ramsar Phases 1 and 2 which are included in this assessment are also listed in Appendix 2 of that report. Conservation Objectives for the individual elements of the two Ramsar Sites are not available and Natural England has advised that Favourable Condition Tables for SSSI units may be used in their place.
- 2.6. Data on the international sites, including qualifying features were taken from the following sources:
- Natural England web site (<https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>) including conservation objectives, site citations and Site Improvement Plans;
  - Joint Nature Conservation Committee website ([www.jncc.gov.uk](http://www.jncc.gov.uk));
  - Verbal and written evidence from officers in Natural England and the Environment Agency;
  - A wide range of published and un-published reports as indicated in section 7 References;
  - Favourable Condition Tables for SSSI units published by Natural England.
  - HRA of Phase Two Revision of the West Midlands RSS – Screening note prepared for Government Office for the West Midlands by Treweek Environmental Consultants;
  - Background information on Ramsar designation and specific site descriptions from [www.ramsar.wetlands.org/](http://www.ramsar.wetlands.org/)

### **Identifying possible mechanisms for significant effects (effect pathways)**

- 2.7. Any sites allocated in the SAMDev Plan, which have not been developed, will be carried forward into the Local Plan Review. These sites, possible effect pathways and any required mitigation measures, have already been considered in the SAMDev Plan HRA (Ref No. 23, section 2.3). As a precautionary measure, these sites will be re-screened against any new information on international sites, if this has become available since the

adoption of the SAMDev Plan, and against any relevant policy wording changes proposed by the LPR. In general, it is likely that these sites and their mitigation measures will be carried over. At this stage of the LPR, only the locations of preferred and strategic Sites are known. This current HRA Screening Report will inform the drafting of policy wording which is to be published later in the plan making process.

- 2.8. The broad mechanisms by which the strategic sites might affect international sites were considered in previous HRA reports. These broad mechanisms may apply during construction or through long-term after-use of the development and include, but are not limited to those listed in Table 2 below.

**Table 2: General effect pathways**

<b>General Effect pathway</b>	<b>Sub-categories</b>
Air pollution	From increased traffic long term.
	Increased NOx gasses and nitrogen deposition.
	Increased sulphur dioxide.
	Increased acid deposition.
Hydrological impacts	Changes to groundwater quality and quantity.
	Changes to surface water quality and quantity.
	Overloading of waste water infrastructure.
	Pollution during flooding events.
	Increased run-off from hard surfaces.
	Increased silt from development, during and post construction, stirring up of sediment by boats, or other leisure activities.
Recreational impacts	Trampling and erosion of international site.
	Disturbance by people, dogs and other pets.
	Swimming by people and dogs.
	Increased hunting pressure from domestic animals.
	Eutrophication through dog faeces.
	Fishing and boat use.
	Damage from bikes and other vehicles.
	Interference with grazing and other management designed to maintain the features of the international sites.
	'Induced development' – development in some form required on international sites to counteract demand from visitors.
Biosecurity	Introduction or spreading of invasive species e.g. through vehicle movement or by boats, people or dogs, or introduction of fish or non-native plants.
Light pollution	Effects of lighting on wildlife.

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- 2.9. More details of these effect pathways and the international sites that may be affected by them can be found in Appendix 3. of the Preferred Sites HRA Screening Report (2018)

<https://shropshire.gov.uk/media/11264/habitats-regulations-assessment-summary-preferred-sites.pdf>

### 3. Screening or assessment of potential effects

- 3.1. The strategic sites in the LPR consultation document have been screened for possible likely significant effects on international sites. A precautionary approach has been taken due to awaiting the results of commissioned research. Screening has taken place without considering mitigation measures. Avoidance and mitigation measures will be taken into account, once policy wording is available, in the Appropriate Assessment stage of the HRA process (Table 1 above).
- 3.2. The strategic sites have been screened for possible pathways to international sites, within a 15km distance. In addition, pathways which could stretch beyond 15km to international sites have also been considered. Where possible, recommendations for particular areas of investigation for the next iterations of the HRA are provided. The screening results are provided in this report's Appendix A (international sites) and in Appendix B (LPR strategic sites). They are summarised in the following sections. A colour coding has been used in these appendices:
- **Green** – no effect or no likely significant effect, alone or in combination with other preferred sites,
  - **Amber** – uncertainty remains and re-screening will take place in the next LPR HRA,
  - **Red** – avoidance or mitigation measures will be required and will be considered later in the LPR Appropriate Assessment stage.
- 3.3. Potential effect pathways identified in Table 2 above and Appendix 3 of the preferred sites HRA Screening Report (November 2018) <https://shropshire.gov.uk/media/11264/habitats-regulations-assessment-summary-preferred-sites.pdf> have been combined under four main headings for this updated screening, namely:
- Air pollution,
  - Water pathways
  - Recreation
  - Lighting.
- Biosecurity effects as a result of development are likely to be related to access by people or their pets and have been included under Recreation.

#### Air pollution

- 3.4. A wide range of pollutants can be airborne, but of key importance in the context of this HRA is nitrogen in the form of nitrogen oxides (NO<sub>x</sub> gases) and ammonia (NH<sub>3</sub>). Excess airborne nitrogen acts as a fertilizer when washed out of the air into soil or water. It may also cause direct damage to vegetation. Many designated habitats, and hence the species they support, rely on low levels of nitrogen in soil and water. Unlike other

airborne pollutants in the UK, there has been a recent reversal in the decline of ammonia emissions.

- 3.5. Other airborne pollutants generally a result from combustion or specific industrial processes.

### **Diffuse or regional air pollution**

- 3.6. Diffuse air pollution is background pollution derived from a wide range of sources and activities that, individually, may have no obvious effect on the environment, but, at the regional scale can have a significant effect. Problems occur in both rural and urban environments.
- 3.7. In the case of our international sites, all are receiving levels of airborne nitrogen which exceed their critical loads, the point at which damage may occur. Clearly any additional pollutants could be important.
- 3.8. Development can contribute cumulatively to an overall change in background air quality across an entire region. It is considered reasonable to conclude that it must be the responsibility of higher-tier plans to set a policy framework for addressing the cumulative cross-border air quality impacts (over which individual authorities have little control). In Shropshire, emissions from additional housing will be reduced as far as possible through general policy wording relating to air quality and insulation and design of dwellings.

### **Local sources of air pollution**

- 3.9. The most significant form of airborne pollution, derived from housing or employment allocations, is the result of increased traffic movements from cars, HGVs and other vehicles. According to the Design Manual for Roads and Bridges 2007, and as stated by Natural England in their consultation response (20th March 2017), the designated sites at risk from local air quality impacts are those which feature habitats that are vulnerable to nitrogen deposition/acidification and are within 200m of a road with increased traffic. For sites within 200m, if the number of traffic movements do not increase (in this case due to the LPR) by more than 1000 Annual Average Daily Traffic (AADT) movements by cars and 200 HGV AADT, either alone or in combination with other plans or projects, then they can be considered insignificant.
- 3.10. When looking at in-combination effects, we must not only consider AADTs generated by the new allocations, but also the AADTs generated by the Local Plans of surrounding counties. Where necessary these will need to be assessed using traffic projections followed by local air quality modelling.

- 3.11. The following international sites are **within** 200m of an A road or busy B road (the remainder were screened out, see section 3.11 of the Preferred Sites HRA Screening Report (November 2018)) :

Berwyn SPA  
Berwyn and South Clwyd Mountain SAC  
Cannock Chase SAC  
Elenydd SAC  
Fens Pools SAC  
Johnstown newt sites SAC  
**Midland Meres & Mosses Ramsar Phase 1**  
**Clarepool Moss**  
**White Mere**  
Wybunbury Moss  
**Midland Meres & Mosses Ramsar Phase 2**  
Black Firs and Cranberry Bog  
Hanmer Mere  
**Hencott Pool**  
Oakhanger Moss  
**Sweat Mere and Crose Mere**  
Montgomery Canal SAC  
Rhos Goch SAC  
**River Clun SAC**  
**River Dee & Bala Lake SAC**  
River Wye SAC  
Tanat & Vrynwy Bat Sites SAC  
**West Midlands Mosses SAC**  
**Clarepool Moss**  
Wybunbury Moss

- 3.12. Research has been commissioned to investigate whether or not there are likely to be significant effects, alone or in-combination, from air pollution derived from traffic as a result of the site allocations in the LPR. Where significant effects are likely, the relevant sites, and avoidance or mitigation measures, will need to be considered in the Appropriate Assessment of the LPR.
- 3.13. As a precautionary measure, all strategic sites have been shown amber in Appendix B for traffic related air pollution, until the findings of the research are available and allocations can be screened further.
- 3.14. The Local Plan Review does not make allocations specifically for large point sources of airborne pollution such as incinerators. However, it does allocate land for employment uses, most of which will not generate more air pollution, other than via traffic movements. However, it is possible that some could produce gaseous or particulate pollution, depending on project specific factors. Currently the Environment Agency are using a maximum screening distance of 5km for intensive livestock units and other emitters

of airborne pollution, when considering applications for Environmental Permits. None of the strategic sites are within 5km of an international site. For major emitters of airborne pollution such as incinerators a 10km buffer has been used in the past and is under review. Using this screening distance as a precautionary measure, the following international sites within 10km of strategic site employment land uses, have been identified:

**Table 3: Potential airborne pollution from employment sites**

<b>International Site</b>	<b>Employment Land</b>	<b>Comment/Suggested Mitigation</b>
Mottey Meadows SAC	RAF Cosford - 5.3km	Policy wording in LPR to cover airborne emissions at Project stage.
	Junction 3 of M54 - 6.6km	

- 3.15. Mitigation measures for air pollution from employment land may include;
- Policy wording to make clear the need for an HRA at the planning application stage, for any development likely to generate airborne pollution, for the above strategic site;
  - utilising industry best practice measures for reducing pollution at the project stage.
  - Retain SAMDev policy MD12 or a policy with similar wording relating to protection of international sites.

### **Water pathways**

- 3.16. These can be divided into strategic and local. Strategic pathways include water abstraction from regional groundwater and the capacity of sewage treatment works to cope with the additional sewage before discharge into water courses. If insufficient water is available for new development in aquifers, or there is insufficient infrastructure to cope with the additional foul-water drainage, then damage could occur to international sites. The strategic sites fall only within the river Severn catchment, but they could theoretically affect any other international site reliant on the regional aquifer to maintain water levels.
- 3.17. The last Water Cycle Study was undertaken in 2014 to inform the SAMDev Plan. An updated Water Cycle Study is being commissioned, which should provide the necessary evidence against which to screen the identified strategic sites. Until this is available, all strategic sites have been screened as having a possible likely significant effect at a strategic level.
- 3.18. Local effects could be those that cause an increase in abstraction from surface water catchments/perched groundwater of international sites or result in increased numbers of package treatment plants/cesspits or other sources of pollution in surface water catchments.

- 3.19. International sites have been screened separately for local effects from housing and employment land on the strategic sites, on water quality and quantity, based largely on maps of surface water catchments. The surface water catchments of most of the Midland Meres and Mosses Ramsar sites have been mapped by Natural England. Shropshire Council has sought further information contained within the Environmental Consultancy University of Sheffield (ECUS) reports, which has allowed refinement of the surface water catchment areas. In addition, Natural England has published Impact Risk Zones (IRZ's) for SSSI's, which take surface water catchments into account.
- 3.20. According to Atkins (2012), consideration of water level data suggests that all of the meres and their respective groundwater catchments are perched above the deep regional groundwater system. The meres are therefore more strongly influenced by the functioning and character of the local aquifer systems of recent, post-glacial origin rather than conditions in the regional aquifer. As a result they are likely to strongly reflect activities in the landscape local to them and may be susceptible to land use changes in their respective catchments. Atkins concluded that in most cases the surface water catchment can be broadly taken as the groundwater catchment.
- 3.21. The above information has been used to update the screening process in the LPR HRA. The strategic sites have been screened out as having no local water quality or quantity effect pathways as none of them lie within the surface water catchments of international sites.
- 3.22. Existing Council policies already require development to avoid adverse impacts on water quality and levels. Policy CS18 Sustainable Water Management of the Core Strategy states that developments will integrate measures for sustainable water management to reduce flood risk, avoid an adverse impact on water quality and quantity within Shropshire, including groundwater resources and sets out detailed requirements of developments. Furthermore, Shropshire Council Sustainable Design (Part 1) SPD 2011 provides detailed guidance to developers on avoiding impacts on water quality and levels through water efficiency and SUDs schemes. As part of planning applications, detailed information necessary to assess impacts on Natura 2000 sites such as groundwater flow direction and levels, any proposed abstraction and so forth will be required from the applicant.

- 3.23. These policies would need to be brought forward and updated for the LPR. Hence, avoidance/mitigation measures may include;
- re-locating strategic sites to avoid impacts,
  - policy wording requiring phasing of development to allow upgrading of infrastructure,
  - policy wording requiring careful design of non-mains foul-water disposal systems and sustainable urban drainage schemes at the project stage.

### **Recreation pathways**

- 3.24. Increased recreation pressure on international sites can cause damage to designated features, disturbance of wildlife by people and their pets, eutrophication of land and water, prevention or alteration to site management and introduction of invasive species or diseases. Natural England have advised that any international sites that do not have public access can generally be screened out for recreational effects. Additional checks have been made for sites without public access but with footpaths crossing the site. It is assumed that where private fishing or sailing clubs are operating on sites, that additional housing will not significantly increase these activities. All international sites are also Sites of Special Scientific Interest and such are protected under the Wildlife and Countryside Act 1981 (as amended) and potentially damaging operations are controlled by Natural England.
- 3.25. The following international sites have been screened out for recreation pathways on the basis that there is no public access, even by public footpath:

***Midland Meres & Mosses Ramsar Phase 1***

**Clarepool Moss**

**Fenemere**

**Marton Pool (Chirbury)**

Quoisley Mere

**White Mere**

***Midland Meres & Mosses Ramsar Phase 2***

**Brownheath Moss**

Chapel Mere

**Hencott Pool**

Llyn Bedydd

Morton Pool and Pasture

Vicarage Moss

River Severn SPA/SAC/Ramsar (77km downstream of Shropshire)

Tanat & Vrynwy Bat Sites SAC

***West Midlands Mosses SAC***

Clarepool Moss

- 3.26. The remaining sites are mostly privately owned, but have some form of public access, often limited to a public footpath either crossing or following the edge of the site:

Berwyn SPA  
Berwyn and South Clwyd Mountain SAC  
**Brown Moss SAC**  
Cannock Chase SAC  
Downton Gorge SAC  
Elenydd SAC  
Fenn's, Whixall, Bettisfield, Wem & Cadney Mosses SAC  
Granllyn SAC  
Johnstown newt sites SAC  
Montgomery Canal SAC  
Rhos Goch SAC  
River Clun SAC  
River Dee and Bala Lake SAC  
River Wye SAC  
**The Stiperstones & the Hollies SAC**  
**West Midlands Mosses SAC**  
Wybunbury Moss  
**Midland Meres & Mosses Ramsar Phase 1**  
**Berrington Pool**  
Betley Mere  
**Bomere and Shomere Pools**  
**Brown Moss**  
Wybunbury Moss  
**Midland Meres & Mosses Ramsar Phase 2**  
Aqualate Mere  
Black Firs and Cranberry Bog  
**Cole Mere**  
Cop Mere  
**Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses**  
Hanmer Mere  
Oakhanger Moss  
Oss Mere  
Sweat Mere and Crose Mere

- 3.27. For many international sites there is little or no information on informal or formal public access to sites. In these cases, Natural England's Accessible Natural Greenspace Guidance (2010) has been used in estimating how far people are likely to travel to natural green spaces. The research which fed into development of this guidance found that larger sites attracted visits from further away and also that a walking distance of approximately 5 minutes from home was defined as a threshold above which daily park visits decreased significantly. The so-called ANGSt,

Natural England's Accessible Natural Greenspace Standard, recommends that everyone should have an accessible natural greenspace:

- of at least 2 hectares in size, no more than 300 metres (5 minutes walk) from home;
- at least one accessible 20 hectare site within two kilometres of home;
- one accessible 100 hectare site within five kilometres of home; and
- one accessible 500 hectare site within ten kilometres of home;

3.28. The background research from which this standard was developed suggested that for sites of the following sizes, people were prepared to travel the following distances to accessible natural greenspace:

- at least 2ha in size, no more than 300m (5 minute walk)
- at least 20 ha in size, no more than 2km
- at least 100ha in size, no more than 5km
- at least 500ha in size, no more than 10km

3.29. The distance from the international site within which 75% of visitors travel can be described as the 'Zone of Influence' for the site. Where this is not known, the above distances have been used to screen international sites and the nearest housing allocations. Privately owned international sites where recreational impacts have not been raised as an issue for the designated features, and footpaths have a low level of use have also been screened out. For the largest sites, a screening distance of 10km has been used, or 15km if mountain bikes are an issue, as this is the distance considered to be the zone of influence of Cannock Chase, based on mountain bike use and evidenced by visitor surveys.

3.30. All international sites have been screened out for recreation effects due to their area and distance to preferred Strategic Sites.

3.31. As a precautionary measure, due to their large size, the RAF Cosford site and Junction 3 of the M54 will be researched further as they are around 19.7km and 20km and respectively from the Cannock Chase SAC

### **Light Pathways**

3.32. No strategic sites are close enough to international sites to cause direct effects and they have been screened out.

### **Results of screening of international sites**

3.33. Of the 23 international sites which have been identified for consideration in this screening report the following have been screened out, as they will not be affected, or there will be no significant effects alone or in combination, as a result of strategic site allocations without recourse to mitigation measures:

Brown Moss SAC  
Downton Gorge SAC  
Elenydd SAC  
Fenn's etc SAC  
Fens pool SAC  
Granllyn SAC  
Meres and Mosses Ramsar Phase 1 – Berrington Pool  
Meres and Mosses Ramsar Phase 1 – Betley Mere  
Meres and Mosses Ramsar Phase 1 – Bomere and Shomere Pools  
Meres and Mosses Ramsar Phase 1 - Brown Moss  
Meres and Mosses Ramsar Phase 1 – Fenemere  
Meres and Mosses Ramsar Phase 1 – Marton Pool Chirbury  
Meres and Mosses Ramsar Phase 1 – Quoisley Mere  
Meres and Mosses Ramsar Phase 2 – Aqualate Mere  
Meres and Mosses Ramsar Phase 2 – Brownheath Moss  
Meres and Mosses Ramsar Phase 2 – Chapel Mere  
Meres and Mosses Ramsar Phase 2 – Cole Mere  
Meres and Mosses Ramsar Phase 2 – Cop Mere  
Meres and Mosses Ramsar Phase 2 – Fenn's, Whixall, Bettisfield,  
Cadney and Wem Mosses  
Meres and Mosses Ramsar Phase 2 – Llyn Bedydd  
Meres and Mosses Ramsar Phase 2 – Morton Pool and Pasture  
Meres and Mosses Ramsar Phase 2 – Oss Mere  
Meres and Mosses Ramsar Phase 2 – Vicarage Moss  
Mottey Meadows SAC  
Rhos Goch SAC  
River Clun SAC

### **Screening of policy options**

- 3.34. The LPR does not intend to revisit all policies in the Core Strategy and the SAMDev Plan. Many will be transferred directly to the new Local Plan. Core Strategy and SAMDev policies have already been subjected to the HRA process (Ref. Nos. 16 and 22), but as a precautionary approach, all policies in the final Local Plan whether modified, new or unaltered, will be re-screened in the light of any new information on international sites.
- 3.35. Two draft policies have been proposed in the Preferred Options: Scale and Distribution of Development document. These are criteria based policies to cover the management of development in Community Hubs and the management of development in Community Clusters. Policy wording will be re-assessed for the consultation document on policy wording.

### **Summary of the results of HRA screening**

- 3.36. All the strategic sites in the LPR consultation document have been considered in the HRA Screening Report and recommendations made. However, none of the strategic sites have been screened out at this stage as final reports for key areas of investigation have yet to be submitted. Recommendations have been made for further information gathering and avoidance/mitigation measures for preferred strategic sites where potential significant effects on international sites have been identified. The majority of these recommendations are for policy wording to be considered whilst drafting policies for the next stage of the LPR.
- 3.37. Additional baseline information is expected e.g. an updated Water Cycle Study, investigations into air quality changes due to the proposed growth and consideration of possible recreation effects on Cannock Chase. When available this additional information will inform the next HRA and policy wording.
- 3.38. Of the international sites initially screened in to this assessment, 9 SACs and 17 component sites of the meres and Mosses Phase 1 and 2 Ramsar Sites have now been screened out. The remaining sites will be carried forward for consideration in subsequent Habitats Regulations Assessments of the LPR documents in relation to strategic sites and overall in-combination assessments.

#### **4. In-combination effects**

- 4.1. The Habitats Directive requires Local Authorities to assess 'in-combination' effects alongside direct effects. 'In-combination' effects occur when otherwise non-significant proposals combine and cumulatively lead to a significant effect. This interaction can occur from proposals within the LPR or between the LPR and other plans or projects. The absence of detailed policies at this stage of the LPR means that in-combination effects outside the LPR have not been considered in this HRA Screening Report.
- 4.2. Preferred site allocations and strategic sites have been screened individually and in-combination with each other. Policies will be screened alone and in-combination in later HRAs.
- 4.3. The LPR will also be screened against other Shropshire plans (e.g Shropshire Local Transport and Economic Growth Strategy) and the plans of all surrounding local authorities for adverse in-combination effects. Statutory Agencies including Natural England, National Resources Wales and the Environment Agency will also be consulted. Any significant in-combination effects must be avoided or sufficiently mitigated in the final Local Plan Review document.

## **5. Conclusions and recommendations**

- 5.1. A total of 23 international sites have been identified for consideration in this strategic sites HRA Screening Report. Nine SACs and 17 component sites of the Meres and Mosses Phase 1 and 2 Ramsar Sites have now been screened out. The remaining sites will be considered for the HRA of subsequent LPR documents.
- 5.2. Possible pathways for significant adverse effects on these international sites as a result of the LPR have been identified and placed in four main categories of
  - air pollution,
  - water pathways,
  - recreation and
  - light pollution,for this round of HRA screening.
- 5.3. The strategic sites in the LPR consultation document have been considered in the HRA Screening Report and recommendations made. As a precautionary measure none of the strategic sites have been screened out at this stage as the results of commissioned research have still to be submitted.
- 5.4. Key areas for consideration in the next stages of LPR preparation are:
  - Taking into account the final results of an updated water cycle study, road traffic investigations and recreational assessment for possible impacts on Cannock Chase SAC. Dependant on the outcome of these studies, policy wording and avoidance of certain locations for strategic sites may be needed to ensure development will only start if sufficient resources, mitigation measures and infrastructure are in place.
  - Policy wording must avoid any likely significant adverse effects, or adverse effects on international site integrity, either alone or in-combination.
  - HRA Screening of proposed policy wording.
  - Screening for in-combination effects with other plans or projects.
- 5.5. The Habitats Regulations Assessment process will be carried out in parallel with the preparation of future Local Plan Review documents. This parallel preparation process will ensure that the results of the HRA will be fully considered in decisions on the Local Plan. It will also ensure Shropshire Council meets its duty with regard to the aims of the Habitats Directive.

## **6. Public consultation**

- 6.1. The Shropshire Council Local Plan Review consultation on Strategic Sites lasts for 10 weeks, beginning on 1st July 2019 and finishing on 9th September 2019. This HRA Screening Report is published as a supporting document for the consultation and comments on it are welcomed. Responses and additional information will be analysed and where appropriate fed into the future stages of the Local Plan Review Habitats Regulations Assessment.
- 6.2. Comments should be sent to [planning.policy@shropshire.gov.uk](mailto:planning.policy@shropshire.gov.uk)
- 6.3. Please ensure that the subject line in any email includes the phrase 'HRA'. It is also helpful if comments refer to the relevant paragraph, section or table number in this document.

## **7. References and abbreviations**

The following documents have informed this report:

### **References**

1. Article 6(3) and (4) of the European Communities (1992) Council Directive 92/43/EEC on the conservation of natural habitats and wild fauna and flora (the Habitats Directive)
2. Atkins for Environment Agency and Natural England (October 2014) River Clun SAC Nutrient Management Plan- FINAL
3. David Tyldesley and Associates for Countryside Council for Wales. (2012) Draft Guidance for Plan Making Authorities in Wales, The Appraisal of Plans Under the Habitats Regulations for Countryside Council for Wales CCW Bangor
4. Department for Communities and Local Government (2012) The National Planning Policy Framework
5. European Commission (2001) Assessment of plans and projects significantly affecting Natura 2000 sites
6. Highways Agency, (2007) Design Manual for Roads and Bridges HA207/07, Volume 11, Section 3, (2007), Environmental Assessment Techniques.
7. Montgomery Canal Partnership (2005) Montgomery Canal: A Conservation Management Strategy
8. ODPM Circular 06/2005: (Biodiversity and Geological Conservation – Statutory Obligations and their impact within the Planning System)
9. Scottish Natural Heritage (January 2015) Habitats Regulations Appraisal of Plans
10. Shropshire Council Local Development Framework Adopted Core Strategy March 2011
11. Shropshire Council Development within the River Clun Catchment Interim Guidance Note 12, 2013
12. Shropshire Council (2010) Outline Water Cycle Study Final Report
13. Shropshire Council (2014) Water Cycle Evidence for Shropshire Local Plan
14. The Conservation of Habitats and Species Regulations 2010 (the “Habitats Regulations”) (SI No. 2010/490).
15. White, J, Liley, D. & Underhill-Day, J. (2009). Cannock Chase Visitor Impact Mitigation Strategy. Footprint Ecology.

### **Previous Shropshire HRA documents**

16. Core Strategy Development Plan Document: Habitats Regulation Assessment, Screening Report (March 2009)
17. Core Strategy Development Plan Document: Habitats Regulation Assessment, Stage 2 Report (February 2010)
18. Draft Mineral Allocations for the plan period 2012-2026 HRA Stage 3 Report (Specific Sites) June 2011

Local Plan Review Preferred Strategic Sites:  
HRA Screening Report

19. Draft Stage 3 Habitats Regulation Assessment Reports of potential allocations was prepared in October 2011 for the Site Allocations and Management of Development DPD
20. SAMDev Draft Development Management Policies HRA January 2013
21. SamDev Pre-Submission Draft Habitats Regulation Assessment (draft March 2014)
22. Habitats Regulations Assessment of Mineral Allocations for the plan period 2012 – 2026 Report (draft March 2014)
23. Shropshire Council SAMDev Habitats Regulation Assessment (July 2014)
24. Shropshire Council (January 2017) Local Plan Review 2016 – 2036, Issues and Strategic Options Habitat Regulations Assessment Initial Screening Report.
25. Shropshire Council Local Plan Review Consultation on Preferred Scale and Distribution of Development (October 2017) HRA Screening Report.
26. Shropshire Council Local Plan Review Consultation on Preferred Sites (November 2018)
27. Shropshire Council Local Plan Review Consultation on Strategic Sites (July 2019)

### Abbreviations and definitions

NE	Natural England
EA	Environment Agency
HRA	Habitats Regulations Assessment
SPA	Special Protection Area classified in accordance with Article 4 of the EC Birds Directive (1979)
SAC	Special Area of Conservation designated under the EC Habitats Directive.
Ramsar site	A site listed as a wetland of international importance under the provision of the Ramsar Convention. A Ramsar site is not a 'European site' as a matter of law but is given the same protection as SPA's and SAC's.
International site	One of the following designated sites: <ul style="list-style-type: none"><li>• Special Area of Conservation (SAC),</li><li>• candidate SAC (cSAC),</li><li>• possible SAC (pSAC),</li><li>• Special Protection Area (SPA),</li><li>• potential SPA (pSPA),</li><li>• proposed and listed Wetlands of International Importance (Ramsar Sites)</li></ul>
Natura 2000 Site	The Europe wide network of SPA's and SAC's
IRZ	Natural England Impact Risk Zone
LPR	Local Plan Review
SAMDev	Site Allocations & Management of Development Plan
SPD	Supplementary Planning Document

**8. Appendix A: Results of strategic sites screening:  
international Sites**

**Appendix A: Results of preferred/potential strategic sites screening: international sites**

	no effect or no likely significant effect from strategic site proposals, alone or in-combination.
	uncertainty remains and re-screening will take place in the next LPR HRA
	avoidance or mitigation measures will be required and will be considered later in the LPR Appropriate Assessment stage
	Screened out from further consideration for strategic site proposals

SCREENING OUT										
International Sites	AIR		WATER		RECREATION AND BIOSECURITY		LIGHT	Screen OUT		
	Roads	Employment land	Regional Water	Local Water	No public access	Distance of strategic sites				
Berwyn SPA										
Berwyn and South Clwyd Mountain SAC										
Brown Moss SAC									Ternhill	10.3km
Cannock Chase SAC									J3 Ternhill Cosford Ironbridge	20km 33.9km 19.7km 34.1km
Downton Gorge SAC										
Elenydd SAC										
Fenn's etc SAC									Ternhill	14km
Fens Pools SAC	Embedded in urban Dudley.									
Granlyn SAC										
Johnstown newt sites SAC										
R1 Berrington Pool									Ironbridge	11.6km
R1 Betley Mere										
R1 Bomere and Shomere Pools									Ironbridge	13.7km
R1 Brown Moss										
R1 Clarepool Moss										
R1 Fenemere										
R1 Marton Pool, Chirbury										
R1 Quoisley Mere									Ternhill	16km
R1 White Mere										
R1 Wybunbury Moss										
R2 Aqualate Mere									Ternhill Junc 3 Cosford	15km 10km 13.7km
R2 Black Firs and Cranberry Bog										
R2 Brownheath Moss										
R2 Chapel Mere										
R2 Cole Mere										
R2 Cop Mere									Ternhill	14km
R2 Fenn's etc									Ternhill	14km
R2 Hanmer Mere										



**9. Appendix B Results of strategic sites screening: LPR sites**

## Appendix B: Results of strategic sites screening: LPR sites

- no effect or no likely significant effect from Strategic Sites, alone or in-combination.
- uncertainty remains and re-screening will take place in the next LPR HRA
- avoidance or mitigation measures will be required and will be considered later in the LPR Appropriate Assessment stage

Strategic Site	Area (ha)	Housing Nos	Employment area, including windfall	SAC/Ramsar name/s	Effect pathways						FUTURE HRA
					AIR		WATER		RECREATION & BIOSECURITY	LIGHT	
As on SC website				Within 15km	Traffic emissions	Other	Water Cycle Study	Water (local)		Adverse effects of artificial lighting	
IRN001 Former Ironbridge Power Station	142ha	1000	6ha	*River Severn for all*** Berrington Pool Ramsar Phase 1, Bomere and Shomere Pools Ramsar Phase 1.		>10km from all international sites		Not in catchment	No international site less than 10km away. Cannock Chase >15km away.		
P28 & parts of P30 & P40 RAF Cosford	203	MOD uses	Area/type unknown	Aqualate Mere Ramsar Phase 2, Mottey Meadows SAC.		Mottey Meadows SAC >6.6km away Aqualate Mere Ramsar >10km		Not in catchment			
BNT002 Clive Barracks, Ternhill	50ha	450 by 2036 plus 300 after	5.75ha	Brown Moss SAC, Fenn's etc. SAC and Ramsar Phase 2, Aqualate Mere Ramsar Phase 1, Cop Mere Ramsar Phase 2, Oss Mere Ramsar Phase 2		>10km from all international sites		Not in catchment			
P26 Amended Junction 3 M54 (identified but not a preferred site)	not yet defined	c. 3000 plus local centre	c. 50ha	Mottey Meadows SAC, Aqualate Mere Ramsar Phase 1		Mottey Meadows 5.3km Aqualate 10km		Not in catchment	Mottey Meadows 5.3km		