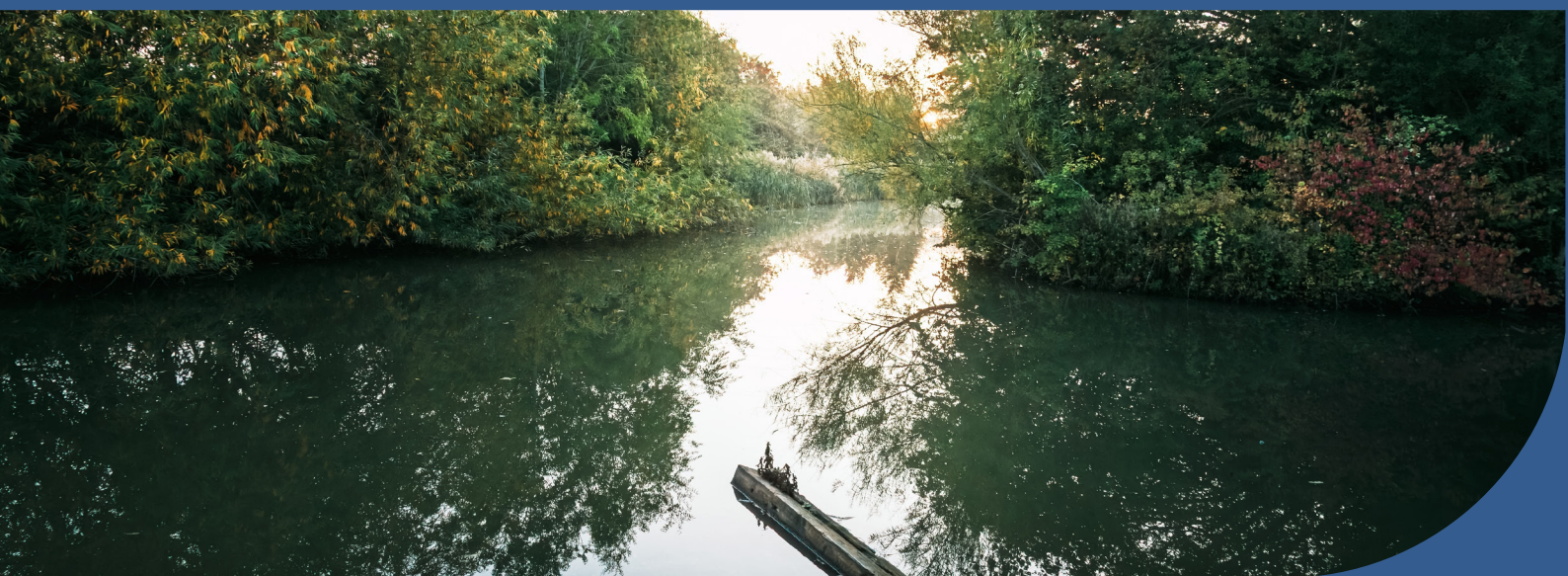


Rugby Borough Council Local Plan

Habitats Regulations Assessment

Regulation 19

December 2025



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Rugby Borough Local Plan Habitats Regulations Assessment

Regulation 19 Consultation

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Acronyms & Abbreviations

AA	Appropriate Assessment
AIOSI	Adverse Impact on Site Integrity
ALS	Abstraction License Strategy
APIS	Air Pollution Information System
CAMS	Catchment Abstraction Management Strategy
CIEEM	Chartered Institute of Ecology and Environmental Management
DTA	David Tyldesley and Associates
EA	Environment Agency
EPs	Environmental Permits
FLL	Functionally Linked Land
GIS	Geographic Information System
HoF	Hands-off-Flow
HRA	Habitats Regulations Assessment
IAQM	Institute of Air Quality Management
IRZ	Impact Risk Zone
JNCC	Joint Nature Conservation Committee
LPA	Local Planning Authority
LSE	Likely Significant Effect
NE	Natural England
pSAC	Possible/proposed Special Area of Conservation
pSPA	Potential Special Protection Area
RBMP	River Basin Management Plan
SAC	Special Area of Conservation
SIP	Site Improvement Plan
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
STW	Severn Trent Water
SuDs	Sustainable Drainage Systems
SWMC	Surface Water Management Catchment
SWMP	Surface Water Management Plan
UK	United Kingdom
WCS	Water Cycle Study
WFA	Whole Feature Assessments
WFD	Water Framework Directive
WRMP	Water Resource Management Plan
WRZ	Water Resource Zone
WwTW	Wastewater Treatment Works
ZOI	Zone of Influence

Executive summary

- E1. Lepus Consulting was appointed, on behalf of Rugby Borough Council, to undertake a Habitats Regulations Assessment (HRA) in compliance with the Habitats Regulations 2017 (as amended)¹ of the Proposed Submission Draft Rugby Borough Local Plan (referred to hereafter as the Local Plan) at Regulation 19.
- E2. HRA is undertaken in a number of stages. The first stage of the process is Screening (Stage 1) which aims to identify whether there are any aspects of a plan which may lead to a Likely Significant Effect (LSE) at a European site, either alone or in combination with other plans or projects. Stage 2 of the process, known as the Appropriate Assessment, is undertaken where screening concludes LSEs. Where an Appropriate Assessment concludes adverse impacts on site integrity cannot be mitigated, the next stage in the process is the consideration of alternative solutions (Stage 3). Where no alternative solutions are available it is next necessary to proceed to Stage 4 of the process where consideration is given to imperative reasons of overriding public interest and securing compensatory measures.
- E3. This report provides the outputs of the HRA screening process (Stage 1), undertaken alongside preparation of the Rugby Local Plan, and the Appropriate Assessment (AA) (Stage 2).
- E4. The Local Plan is not directly connected with or necessary to the management of any European site. Consideration was therefore given to potential links or causal connections between the effects of the Local Plan and European sites to identify LSEs. This exercise was undertaken through the collation of information for each European site and application of a 'source-pathway-receptor' model.
- E5. Each component of the Proposed Submission Draft Local Plan, including policies and development allocations, was screened for LSEs. Taking no account of mitigation measures, the screening stage concluded that the Local Plan has the potential to have in-combination recreation LSEs at Ensor's Pool Special Area of Conservation (SAC) and in-combination water quality LSEs at functionally linked watercourses associated with the Severn Estuary SAC, Severn Estuary Ramsar, Humber Estuary SAC and Humber Estuary Ramsar.
- E6. It was therefore concluded that the Local Plan would be screened into the HRA process, and an AA was undertaken.
- E7. The AA focussed on evaluating whether the policies and site allocations within the Local Plan could result in adverse effects on the integrity of the screened in European sites, either alone or in combination with other plans or projects. The AA examined two key impact pathways identified through screening: water quality effects associated with development within the Local Plan upon functionally linked watercourses associated with migratory fish from the Severn Estuary SAC, Severn Estuary Ramsar, Humber Estuary

¹ The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Date accessed: 08/12/25].

SAC and Humber Estuary Ramsar, and an increase in recreational pressure at Ensor's Pool SAC.

- E8. Using the latest modelling outputs within the 2025 Water Cycle Study (WCS), policy safeguards in both the high-level water planning framework and Local Plan itself, alongside a review of accessibility and alternative recreational resources, the AA concluded that the Local Plan would result in no adverse impact on the integrity of the Humber Estuary SAC, Humber Estuary Ramsar, Severn Estuary SAC, Severn Estuary Ramsar, or Ensor's Pool SAC, either alone or in-combination.
- E9. Rugby Borough Council, as the Competent Authority, has responsibility to make the Integrity Test, which can be undertaken in light of the conclusions set out in this report. Rugby Borough Council must 'have regard' to Natural England's representations under the provisions of Habitats Regulations.

1 Introduction

1.1 A new Local Plan for Rugby Borough

- 1.1.1 Rugby Borough Council (the Council) is reviewing the current Local Plan, adopted in 2019 and spanning the period 2011–2031². The new Local Plan will span the period 2025–2042, and cover the administrative area of Rugby Borough, including the primary urban settlement of Rugby town, alongside nine main rural settlements, and 25 smaller rural villages. This area is hereafter referred to as the ‘Plan area’ and is illustrated in **Figure 1.1**.
- 1.1.2 Once adopted, the Local Plan will form part of the statutory development plan for the borough covering the period to 2042, replacing and updating the Local Plan 2011–2031.
- 1.1.3 A ‘call for sites’ exercise ran alongside an Issues and Options consultation between 31 October 2023 and 2 February 2024. The Issues and Options stage sought views on the key planning challenges and potential approaches to meeting future development needs³. The Council subsequently prepared the Regulation 18 Preferred Options draft⁴, which outlined its emerging strategy, preferred policy approaches and indicative site allocations and was consulted upon between 24 March and 19 May 2025. The responses to these consultations have informed the Proposed Submission Draft Plan at Regulation 19.

1.2 Habitats Regulations Assessment

- 1.2.1 The application of HRA to land use plans is a requirement of the Conservation of Habitats and Species Regulations 2017 (as amended)⁵. HRA applies to plans and projects, including all Local Development Documents in England and Wales.
- 1.2.2 Where a plan is likely to have a significant effect on a European site (either alone, or in combination) and is not directly connected with, or necessary to, the management of the European site, the Habitats Regulations notes that the plan-making authority for that plan must, before the plan is given effect, make an AA of the implications for the site in view of that site’s conservation objectives. These tests are referred to collectively as a Habitats Regulations Assessment (HRA).
- 1.2.3 The Habitats Regulations provide a definition of a European site at Regulation 8. These sites include Special Areas of Conservation (SACs), Sites of Community Importance, Special Protection Areas (SPAs) and sites proposed to the European Commission in accordance with Article 4(1) of the Habitats Directive. In addition, policy in England and Wales notes that the following sites should also be given the same level of protection as European sites⁶:

- A potential SPA (pSPA);

² Rugby Borough Council (2019) Rugby Borough Council Local Plan 2011–2031. Available at: <https://www.rugby.gov.uk/w/local-plan-2011-2031> [Date accessed: 09/12/25]

³ Rugby Borough Council (2024) Local Plan review – issues and options consultation. Available at: <https://www.rugby.gov.uk/local-plan-review> [Date accessed: 09/12/25]

⁴ Rugby Borough Council (2025) Local Plan review preferred options consultation. Available at: <https://www.rugby.gov.uk/local-plan-review-preferred-options-consultation> [Date accessed: 09/12/25]

⁵ The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date accessed: 05/12/25].

⁶ Ministry of Housing, Communities and Government (December 2024) National Planning Policy Framework.

- A possible/proposed SAC (pSAC);
- Listed and proposed Ramsar Sites (wetlands of international importance); and,
- In England, sites identified or required as compensation measures for adverse effects on statutory European sites, pSPAs, pSACs and listed or proposed Ramsar sites.

1.2.4 This HRA screening report has been prepared using the following guidance:

- Planning Practice Guidance: Appropriate Assessment⁷; and,
- The Habitats Regulations Assessment Handbook – David Tyldesley and Associates (referred to hereafter as the DTA Handbook), 2013 (in particular Part F: ‘Practical Guidance for the Assessment of Plans under the Regulations’)⁸.

1.3 Previous HRA work

1.3.1 The Rugby Local Plan 2011–2031 was adopted on 4th June 2019⁹ and sets out a development strategy and planning policies. It was supported by an HRA which was undertaken iteratively throughout plan preparation¹⁰. A screening HRA report for the adopted Local Plan considered likely significant effects upon European sites within 20km of the Plan area (Ensor’s Pool SAC and River Mease SAC), focusing specifically on hydrological impact pathways. The HRA concluded that there would be no adverse impacts on the integrity of European sites either alone or in-combination and provided recommendations.

1.3.2 At Regulation 18, the Preferred Options draft of the emerging Local Plan was supported by an HRA which screened each component of the Local Plan, including policies and development allocations, for Likely Significant Effects (LSEs). Taking no account of mitigation measures, the screening stage concluded that the Local Plan has the potential to have recreational effects at Ensor’s Pool SAC and in-combination water quality effects at functionally linked watercourses associated with the Severn Estuary SAC, Severn Estuary Ramsar, Humber Estuary SAC and Humber Estuary Ramsar. It therefore concluded that the Rugby Local Plan would be screened into the HRA process for further assessment through an Appropriate Assessment (AA).

⁷ Ministry of Housing, Communities and Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment.

⁸ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (June) (2024) edition UK: DTA Publications Limited.

⁹ Rugby Borough Council. Local Plan 2011-2031 Adoption. Available at: <https://www.rugby.gov.uk/w/local-plan-2011-31-adoption> [Date accessed: 05/12/25].

¹⁰ Ecological Services (December 2018) Final Screening Report and Formal Screening Decision Habitat Regulations Assessment (HRA) for Rugby Borough Council Local Plan 2018.

1.4 Purpose of report

- 1.4.1 Lepus Consulting has been commissioned by the Council to carry out an HRA to support the preparation of the proposed submission draft of the Local Plan¹¹. The proposed submission draft is also known as the Regulation 19 version of the plan because Regulation 19 of the Local Plan Regulations 2012¹² requires that local plans are subject to particular stages of consultation.

¹¹ Rugby Borough Local Plan 2025 – 2042, Proposed Submission Draft, January 2026.

¹² The Town and Country (Local Planning) (England) Regulations 2012 Statutory Instrument 767.

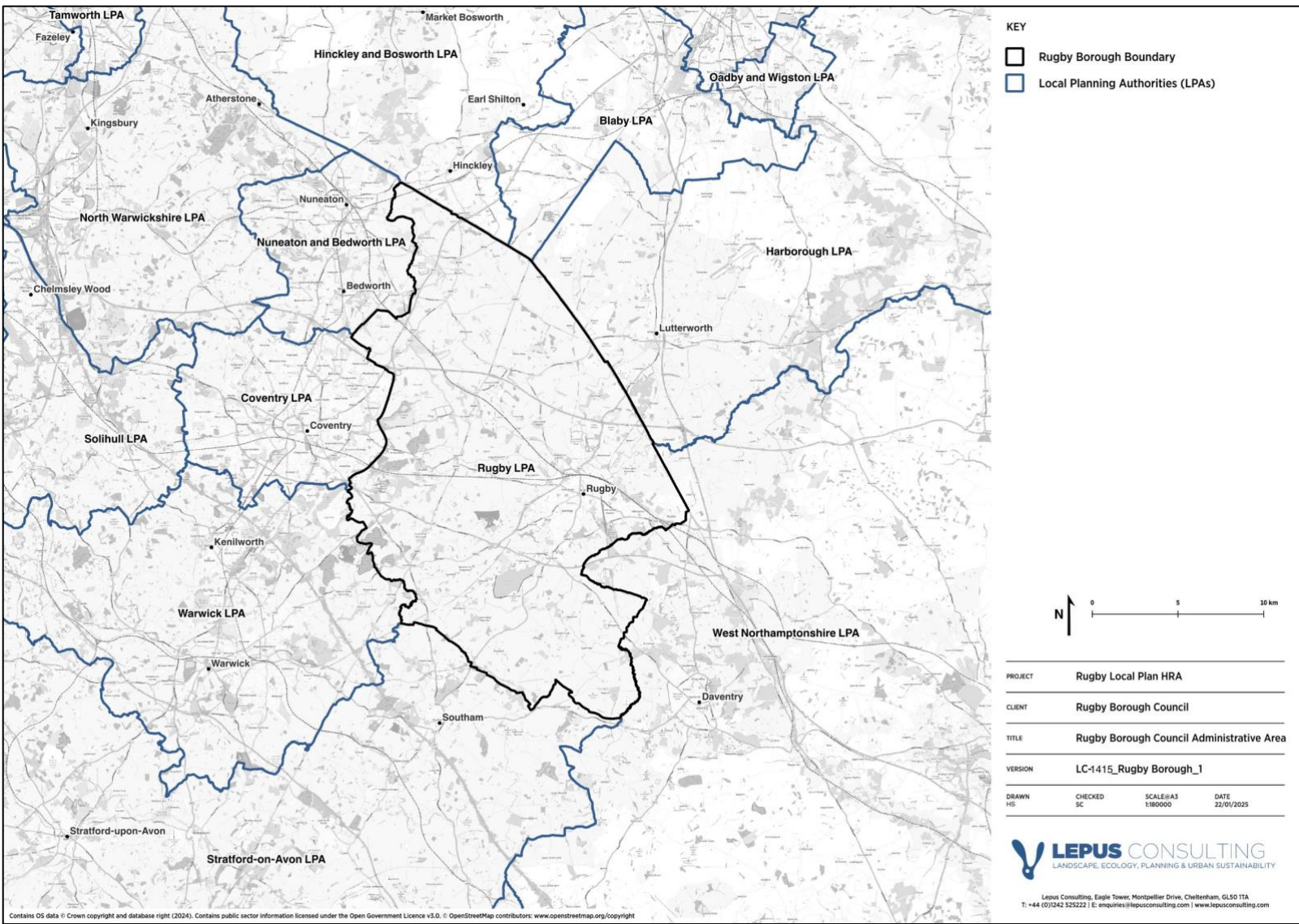


Figure 1.1: Rugby Local Plan Area

2 Methodology

2.1 Overview

2.1.1 HRA is a rigorous precautionary process centred around the conservation objectives of a European site's qualifying interests. It is intended to ensure that European sites are protected from impacts that could adversely affect their integrity. A step-by-step guide to the methodology followed for the HRA, as outlined in the DTA Handbook, is illustrated in **Figure 2.1**.

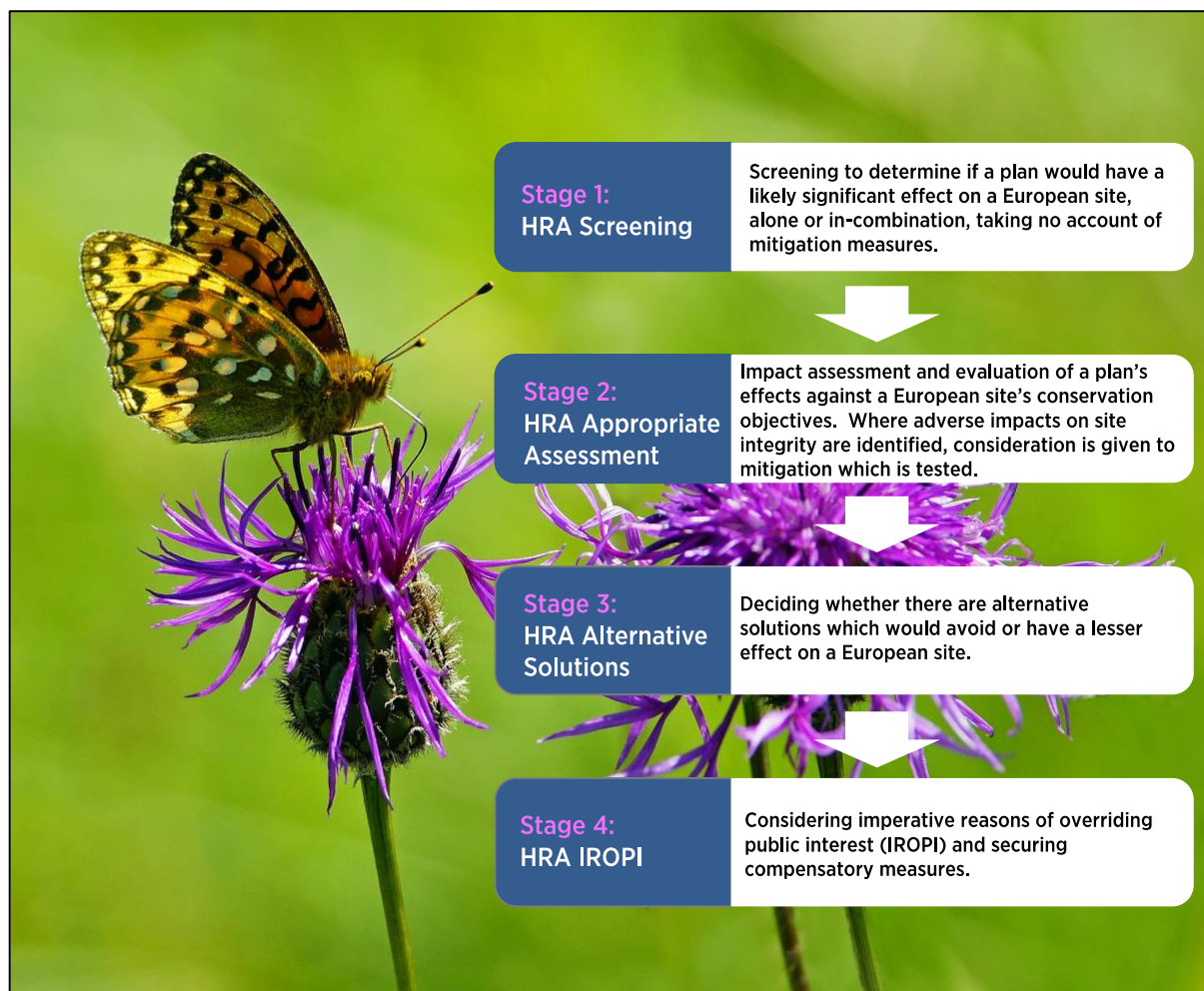


Figure 2.1: Stages in the Habitats Regulations Assessment process¹³

¹³ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (December) (2019) edition UK: DTA Publications Limited.

2.2 Stage 1: Screening for Likely Significant Effects

- 2.2.1 The first stage in the HRA process comprises the screening stage (see **Figure 2.1**). The purpose of the screening process is to firstly determine whether a plan is either (1) exempt (because it is directly connected with, or necessary to, the management of a European site); (2) able to be excluded (because it is not a plan); or, (3) able to be eliminated (because there would be no conceivable effects) from the HRA process. If none of these conditions apply, it is next necessary to identify whether there are any aspects of a local plan which may lead to an LSE at a European site, either alone, or in combination with other plans or projects.
- 2.2.2 Screening was undertaken of the Regulation 18 Preferred Options draft (see **Section 1.3**), which concluded that it had the potential to have LSEs on a number of European sites, both alone, and for a number of policies / allocations, in-combination. It therefore concluded that the Local Plan would be screened into the HRA process, and an AA would be required (Stage 2 – **Figure 2.1**).
- 2.2.3 Where elements of the Local Plan have been updated in response to the Regulation 18 consultation, these components have been re-screened to determine whether the proposed submission draft Local Plan is likely to have an LSE alone or in-combination.
- 2.2.4 Where elements of the Local Plan will not result in an LSE on a European site (alone, or in-combination), these elements are screened out and not considered in further detail in the HRA process. Where LSEs are identified, these elements of the Local Plan are screened in for further consideration in an AA. The screening process uses a number of evaluation codes to summarise whether a plan component is likely to have LSEs alone, or in-combination. These codes are set out in **Table 2.1** and are used to inform the formal screening decision (Column 2).

Table 2.1: Screening evaluation and reasoning categories from Part F of the DTA Handbook¹⁴

Screening evaluation and reasoning categories from Chapter F of the Habitats Regulations Assessment Handbook (DTA Publications, 2013):	Screen in / Screen out
A. General statements of policy / general aspirations.	Screen Out
B. Policies listing general criteria for testing the acceptability / sustainability of proposals.	Screen Out
C. Proposal referred to but not proposed by the Plan.	Screen Out
D. General plan-wide environmental protection / designated site safeguarding / threshold policies.	Screen Out
E. Policies or proposals that steer change in such a way as to protect European sites from adverse effects.	Screen Out
F. Policies or proposals that cannot lead to development or other change.	Screen Out
G. Policies or proposals that could not have any conceivable or adverse effect on a site.	Screen Out

¹⁴ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (December) (2019) edition UK: DTA Publications Limited. Available at: <http://www.dtapublications.co.uk/> [Date accessed: 05/12/25]

Screening evaluation and reasoning categories from Chapter F of the Habitats Regulations Assessment Handbook (DTA Publications, 2013):	Screen in / Screen out
H. Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in-combination with other aspects of this or other plans or projects).	Screen Out
I. Policies or proposals with a Likely Significant Effect on a site alone.	Screen In
J. Policies or proposals unlikely to have a significant effect alone.	Screen Out
K. Policies or proposals unlikely to have a significant effect either alone or in-combination.	Screen Out
L. Policies or proposals which might be likely to have a significant effect in-combination.	Screen In
M. Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European site.	Screen In

2.2.5 The judgement by the European Court of Justice on the interpretation of the Habitats Directive in the case of People Over Wind and Sweetman vs Coillte Teoranta (Case C-323/17¹⁵) determined that mitigation measures are only permitted to be considered as part of the AA stage of the HRA process. Therefore, when assessing the LSEs of the Local Plan on European sites, the HRA screening process takes no account of incorporated mitigation or avoidance measures that are intended to avoid or reduce harmful effects on a site. These are measures which, if removed (i.e. should they no longer be required for the benefit of a European site), would still allow the lawful and practical implementation of a plan.

2.2.6 Where screening concludes there are no LSEs from the Local Plan alone, it is next necessary to consider whether the effects of the Local Plan in combination with other plans and projects would result in an LSE on any European site. It may be that the Local Plan alone will not have a significant effect but could have a residual effect that may contribute to in-combination effects on a European site.

2.2.7 Plans and projects which are considered to be most relevant to the in-combination assessment of the Local Plan include those that have similar impact pathways. These include those plans and projects that have the potential to increase development in the HRA study area (see **Appendix A**). In addition, other plans and projects with the potential to increase traffic across the study area and which may act in-combination with the Local Plan, such as the Warwickshire transport, waste and mineral plans, will also be taken into consideration. Plans which allocate water resources or are likely to influence water quality within the study area will also be considered. Finally, local plans of neighbouring authorities (listed below), which may increase development-related pressures at European sites, are considered.

- Blaby District Council
- Cherwell District Council
- Coventry City Council
- Harborough District Council
- Hinckley and Bosworth Borough Council

¹⁵ InfoCuria (2018) Case C-323/17. Available at:
<http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN>. [Date accessed: 03/12/25].

- Leicester City Council
- North Warwickshire Borough Council
- North West Leicestershire
- Nuneaton and Bedworth Borough Council
- Oadby and Wigston Borough Council
- Solihull Metropolitan Borough Council
- Stratford-on-Avon District Council
- Tamworth Borough Council
- Warwick District Council
- West Northamptonshire Council

2.2.8 The approach taken to the consideration of in-combination effects will be compliant with the Wealden Judgement¹⁶, which requires an in-combination approach that considers the development of neighbouring and nearby authorities when assessing LSEs.

2.3 Stage 2: Appropriate Assessment and Integrity Test

2.3.1 Stage 2 of the HRA process comprises the AA and Integrity Test. The purpose of the AA is to undertake an assessment of the implications of a plan for a European site in light of its conservation objectives¹⁷.

2.3.2 As part of this process, plan makers should take account of the potential consequences of no action and the uncertainties inherent in scientific evaluation; and they should consult interested parties on the possible ways of managing this risk, for instance, through the adoption of mitigation measures. Mitigation measures should aim to avoid, minimise or reduce significant effects on European sites. Mitigation measures may take the form of policies within the Local Plan, or mitigation proposed through other plans or regulatory mechanisms. All mitigation measures must be deliverable and able to mitigate the adverse effects for which they are targeted.

2.3.3 An AA presents information regarding all aspects of a local plan and ways in which it could impact a European site, either alone, or in-combination with other plans and projects. The plan-making body (as the Competent Authority) must then ascertain, based on the findings of the AA, whether the Local Plan will adversely affect the integrity of a European site, either alone, or in-combination with other plans and projects. This is referred to as the Integrity Test.

2.4 Dealing with uncertainty

2.4.1 Uncertainty is an inherent characteristic of an HRA, and decisions can be made using currently available and relevant information. This concept is reinforced in the 7th September 2004 'Waddenzee' ruling¹⁸:

¹⁶ Wealden District Council & Lewes District Council before Mr Justice Jay. Available at: <http://SLP.bailii.org/ew/cases/EWHC/Admin/2017/351.html> [Date accessed: 03/12/25].

¹⁷ MHLG and DLHC (2024) Planning Practice Guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>. [Date accessed: 03/12/25].

¹⁸ EUR-Lex (2004) Case C-127/02. Available at: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:62002CJ0127:EN:PDF>. [Date accessed: 03/12/25].

- 2.4.2 *“However, the necessary certainty cannot be construed as meaning absolute certainty since that is almost impossible to attain. Instead, it is clear from the second sentence of Article 6(3) of the Habitats Directive that the competent authorities must take a decision having assessed all the relevant information which is set out in particular in the AA. The conclusion of this assessment is, of necessity, subjective in nature. Therefore, the competent authorities can, from their point of view, be certain that there will be no adverse effects even though, from an objective point of view, there is no absolute certainty.”*

2.5 The Precautionary Principle

- 2.5.1 The HRA process is characterised by the Precautionary Principle. This is described by the European Commission: *“If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered”*. The Precautionary Principle is embedded in the Integrity Test.

3 Scoping of Threats and Pressures at European Sites

3.1 Introduction

- 3.1.1 An important initial stage of the screening process is gathering information on European sites which may be affected by the Local Plan. This is informally known as scoping, and provides an understanding of potential impact pathways from the Local Plan and connections to European sites and their vulnerabilities.

3.2 Identification of an HRA study area

- 3.2.1 Each European site has its own intrinsic qualities, besides the habitats or species for which it has been designated, that enables the site to support its particular ecosystems. An important aspect of this is that the ecological integrity of each site can be vulnerable to change from natural and human induced activities in the surrounding environment (known as pressures and threats). For example, sites can be affected by land use plans in a number of different ways, including the direct land take of new development, the type of use the land will be put to (for example, an extractive or noise-emitting use), or the pressure / threat a development generates (air pollution, water pollution or increased recreational pressure), and the resources used (for example water abstraction).
- 3.2.2 An intrinsic quality of any European site is its functionality at the landscape-ecology scale; this refers to how the site interacts with its immediate surroundings as well as the wider area. This is particularly the case where there is potential for development resulting from a plan to generate water or airborne pollutants, use water resources or otherwise affect water levels. Adverse effects may also occur via impacts to mobile species occurring outside a designated site boundary, but which are qualifying features of the site. For example, there may be effects on protected birds, bats and fish which use land outside a designated site for foraging, feeding, spawning, roosting, breeding or other activities.
- 3.2.3 There is no guidance that defines the study area for inclusion in an HRA. Planning Practice Guidance for AA indicates that: *“The scope and content of an appropriate assessment will depend on the nature, location, duration and scale of the proposed plan or project and the interest features of the relevant site. ‘Appropriate’ is not a technical term. It indicates that an assessment needs to be proportionate and sufficient to support the task of the competent authority in determining whether the plan or project will adversely affect the integrity of the site”*¹⁹.

3.3 Scoping impact pathways

- 3.3.1 Threats and pressures to which European sites are vulnerable have been identified through reference to data held by the Joint Nature Conservation Committee (JNCC) and Natural England and through reference to Ramsar Information Sheets and Site Improvement Plans (SIPs). This information provides current and predicted issues at each European site and is summarised in **Appendix B**.

¹⁹ Ministry of Housing, Communities and Local Government (2019) Planning Practice Guidance: Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment. Available at: <https://www.gov.uk/guidance/appropriate-assessment> [Date accessed: 09/12/25]

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- 3.3.2 Supplementary advice notices prepared by Natural England often provide more recent information on threats and pressures upon European sites than SIPs and have therefore also been reviewed. A number of threats and pressures are unlikely to be exacerbated by the Local Plan and have not been considered.
- 3.3.3 Sites of Special Scientific Interest (SSSIs) are protected areas in the United Kingdom (UK) designated for conservation. SSSIs are the building blocks of site-based nature conservation in the UK. A SSSI will be designated based on the characteristics of its fauna, flora, geology and/or geomorphology. Whilst typically analogous in ecological function, the reasons for SSSI designation can be entirely different to those for which the same area is designated as a SAC, SPA or Ramsar.
- 3.3.4 Natural England conduct Whole Feature Assessments (WFA) which measure the condition of a notified feature across the whole of the SSSI. Alongside this overall condition, Natural England continues to have the ability to assign a different condition to a SSSI unit if needed where a feature is found. This baseline is calculated by following the least favourite business rule, where the overall feature condition is assigned that of the least favourable unit present.
- 3.3.5 The conservation status of each notified feature highlights any areas which are particularly vulnerable to threats/pressures. Conservation status is defined as follows:
- Favourable;
 - Unfavourable – recovering;
 - Unfavourable – no change; or
 - Unfavourable – declining.
- 3.3.6 Notified features classified as in an ‘Unfavourable – no change’ or ‘Unfavourable – declining’ condition may indicate that the SAC is in sub-optimal or poor ecological condition. It is important to remember that the SSSI may be in an unfavourable state due to the condition of features unrelated to its European designation. However, it is considered that the conservation status of SSSI features that overlap with European designated sites offer a useful indicator of habitat health at that location.
- 3.3.7 The overall objective of the Habitats Regulations is to maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of importance. Meeting site conservation objectives will ensure that the integrity of the National Site Network is maintained or restored as appropriate and ensures that each site contributes to achieving the ‘favourable’ conservation status of its qualifying features.

3.3.8 Natural England defines zones around each SSSI which may be at risk from specific types of development; these are known as Impact Risk Zones (IRZ). These IRZs are “a *GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of European sites, which are underpinned by the SSSI designation and “Compensation Sites”, which have been secured as compensation for impacts on Natura 2000/Ramsar sites*”²⁰. The location of IRZs has been taken into consideration in this assessment as they provide a useful guide as to the location of functionally linked land and likely vulnerabilities to development proposed within the Local Plan.

3.3.9 Based on previous HRA work undertaken to support the adopted Local Plan (see **Section 1.3**), the following potential impact pathways are considered to be within the scope of influence of the emerging Local Plan. Land use planning also has the potential to result in impacts upon qualifying features when located outside a designation boundary, known as functionally linked land (FLL)²¹. This HRA therefore also considers effects upon FLL or mobile species within the following topic assessments.

- **Air pollution:** Land use planning has the potential to increase atmospheric emissions of pollutants to the air. These can result in adverse effects at European sites such as eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)²².
- **Water resources and water levels:** Urban development can change run off rates from urbanised areas to European sites or watercourses which run through them. An increase in housing provision can also influence supply and demand for water within the region which may impact water levels.
- **Water quality:** Surface water run-off from urban areas has the potential to reduce the quality of water entering a catchment. Water quality may also be reduced through point source effluent discharges from new development at Wastewater Treatment Works (WwTWs) and other controlled discharge sources. Changes in water quality also have the potential to affect FLL (land or watercourses outside a designated site boundary).
- **Recreational pressure:** New housing development has the potential to increase recreational pressure upon European sites which are accessible to the public.
- **Urbanisation effects:** Urban development has the potential to result in disturbing activities (such as noise, lighting, cat predation and visual disturbance). Disturbance effects may impact upon European sites themselves

²⁰ Natural England (2019) Natural England's Impact Risk Zones for Sites of Special Scientific Interest User Guidance. Available at: https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf [Date accessed: 03/12/25].

²¹ “The term ‘functional linkage’ refers to the role or ‘function’ that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore ‘linked’ to the European site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status”. Source: Natural England (2016) Commissioned Report. NECR207. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions.

²² APIS (2016) Ecosystem Services and air pollution impacts.

and also their qualifying features when outside a designated site boundary. The Local Plan will trigger development in the form of housing, employment and retail development.

- 3.3.10 European sites assessed in this HRA report are identified in **Table 3.1** and illustrated in **Figures 3.1** and **3.2**. European sites have been included taking into consideration a review of impact pathways (for instance hydrological connectivity), a 20km buffer from the Plan area, and previous HRA work undertaken in support of the adopted Local Plan 2011-2031.

Table 3.1: European sites for consideration in the HRA

European site	Location in relation to the Local Plan administrative area
Ensor's Pool SAC	Located outside administrative area, approx. 4km to the west.
River Mease SAC	Located outside administrative area; approx. 18km to the north west.
Humber Estuary SAC	Located outside administrative area, approx. 125.7km to the north east.
Humber Estuary Ramsar	Located outside administrative area, approx. 125.7km to the north east.
Humber Estuary SPA	Located outside administrative area, approx. 133.4km to the north east
Severn Estuary Ramsar	Located outside administrative area, approx. 88.5km to the south west
Severn Estuary SAC	Located outside administrative area, approx. 88.5km to the south west
Severn Estuary SPA	Located outside administrative area, approx. 88.5km to the south west

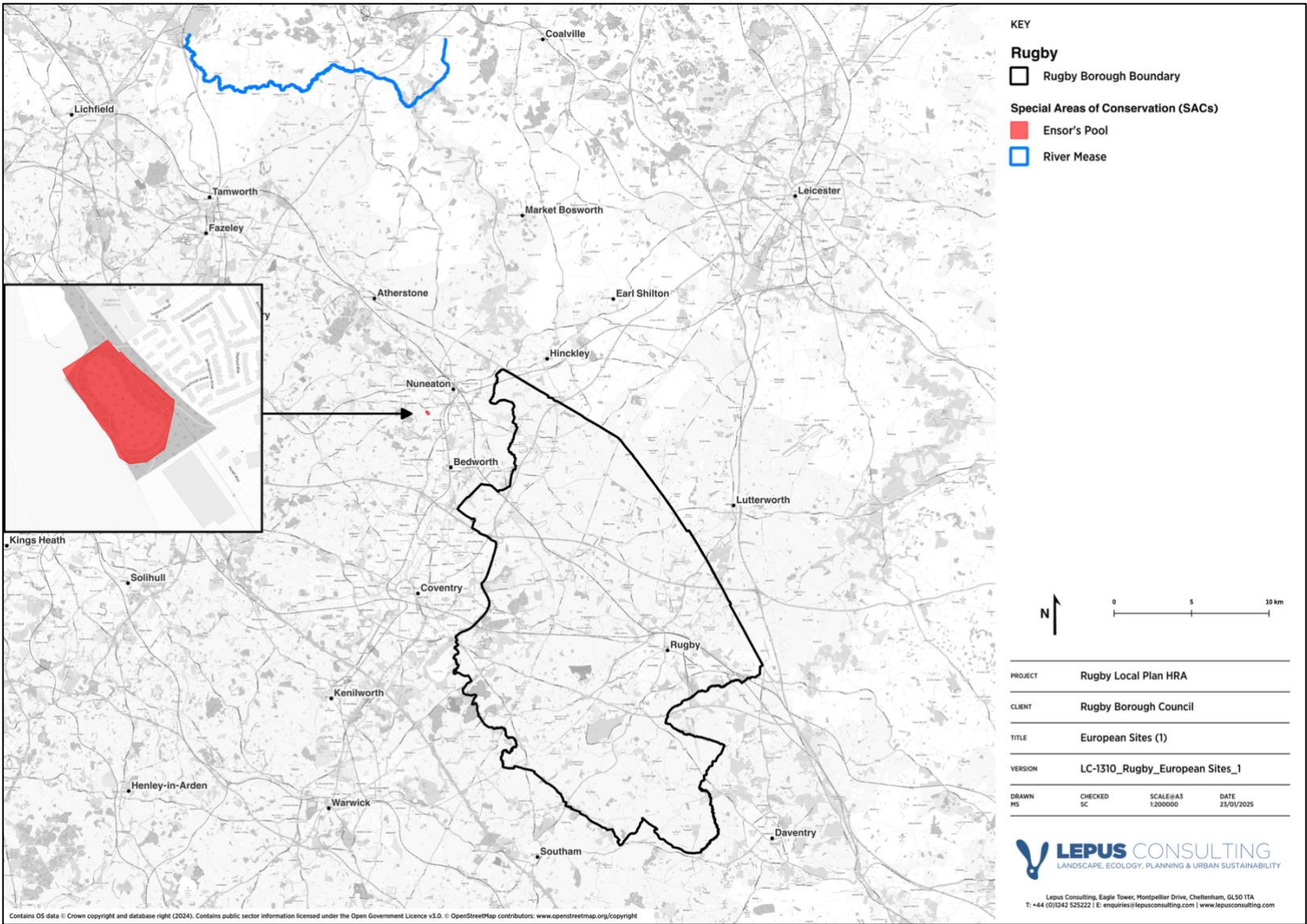


Figure 3.1: European sites located within HRA search area (1)

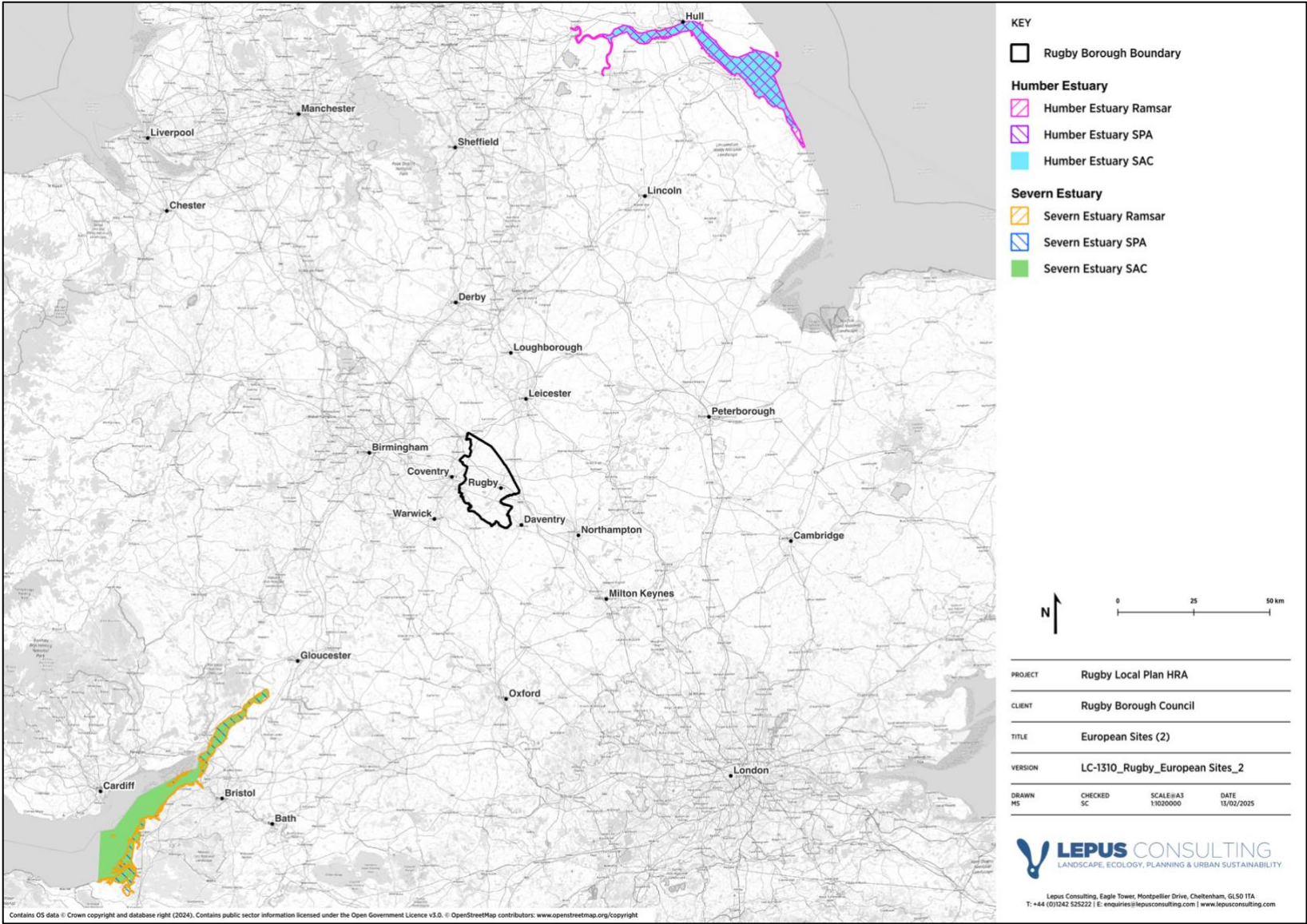


Figure 3.2: European sites located within HRA search area (2)

3.4 Air quality

- 3.4.1 Air pollution can affect a European site if it has an adverse effect on its features of qualifying interest. The main mechanisms through which air pollution can have an adverse effect is through eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides). Deposition of air pollutants can alter the soil and plant composition and species which depend upon these.
- 3.4.2 As highlighted through the review of threats and pressures at European sites (**Appendix B**), air pollution, and in particular atmospheric nitrogen deposition, has been identified as a threat or pressure for qualifying features of a number of European sites within the relevant Natural England SIPs and Supplementary Conservation Advice Notes.
- 3.4.3 Excess atmospheric nitrogen deposition within an ecosystem or habitat can disrupt the delicate balance of ecological processes interacting with one another. As the availability of nitrogen increases in the local environment, some plants that are characteristic of that ecosystem may become competitively excluded in favour of more nitrophilic plants. It also upsets the ammonium and nitrate balance of the ecosystem, which disrupts the growth, structure and resilience of some plant species.
- 3.4.4 Excess nitrogen deposition often leads to the acidification of soils and a reduction in the soils' buffering capacity (the ability of soil to resist pH changes). It can also render the ecosystem more susceptible to adverse effects of secondary stresses, such as frost or drought, and disturbance events, such as foraging by herbivores.
- 3.4.5 As an attempt to manage the negative consequences of atmospheric nitrogen deposition, 'critical loads' and 'critical levels' have been established for ecosystems in Europe. Each European site is host to a variety of habitats and species, the features of which are often designated a critical load for nitrogen deposition.
- 3.4.6 The critical loads of pollutants are defined as a "...quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge"²³. Critical levels are defined as "concentrations of pollutants in the atmosphere above which direct adverse effects on receptors, such as human beings, plants, ecosystems or materials, may occur according to present knowledge"²⁴.

²³ UNECE. ICP Modelling and Mapping Critical loads and levels approach. Available at: https://www.umweltbundesamt.de/en/Coordination_Centre_for_Effects [Date accessed: 03/12/25].

²⁴ Ibid

3.4.7 Natural England has developed a standard methodology for the assessment of traffic-related air quality impacts under the Habitats Regulations which is relevant to the HRA of land use plans which may result in a change in traffic flows²⁵. In addition, the Institute of Air Quality Management (IAQM)²⁶ and the Chartered Institute of Ecology and Environmental Management (CIEEM)²⁷ have also prepared advice on the assessment of air quality impacts at designated sites. This guidance sets thresholds for screening of likely significant (air quality) effects at the HRA screening stage (Stage 1 of the HRA process) and methodologies for further AA (Stage 2 of the HRA process) of air quality impacts where relevant.

3.4.8 Natural England's guidance (in the form of a series of questions below) has been applied to determine potential air quality impact pathways to European sites:

- Does the Local Plan give rise to emissions which are likely to reach a European site?
- Are the qualifying features of sites within 200m of a road sensitive to air pollution?
- Could the sensitive qualifying features of the site be exposed to emissions?
- Application of screening thresholds (alone and then, if necessary, in combination).

Does the Local Plan give rise to emissions which are likely to reach a European site?

3.4.9 The Local Plan will trigger housing, gypsy and traveller and employment development and as such increase traffic-related emissions. Air quality impacts have been shown to typically affect European sites within 10km of a plan boundary²⁸. Campman and Kite (2021) note that *"this zone is based on professional judgment recognising that the effects of growth from development beyond 10km will have been accounted for in the Nitrogen Futures modelling work business as usual scenario"*²⁹. This 10km distance threshold can be a useful guide to identify the broad areas that may be impacted by air quality. However, it is noted that consideration should also be given to larger residential or commercial allocations and their wider potential for air quality impacts in the context of the local and regional road network including key commuting areas set out below (**paragraph 3.4.10**).

²⁵ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Available at: <http://publications.naturalengland.org.uk/publication/4720542048845824> [Date accessed: 03/12/25].

²⁶ Holman et al (2020). A guide to the assessment of air quality impacts on designated nature conservation sites – version 1.1, Institute of Air Quality Management, London.

²⁷ CIEEM (2021) Advice on Ecological Assessment of Air Quality Impacts. Chartered Institute of Ecology and Environmental Management. Winchester, UK.

²⁸ Chapman, C and Kite, B. (2021) Main Report. Guidance on Decision-making Thresholds for Air Pollution. JNCC Report No. 696. Available at: <https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447> [Date accessed: 03/12/25].

²⁹ JNCC. Nitrogen Future. Available at: <https://jncc.gov.uk/our-work/nitrogen-futures/> [Date accessed: 03/12/25].

3.4.10 Data obtained from the Office for National Statistics highlights the most common destinations for journeys to work undertaken by car or van arising from and finishing in the Plan area³⁰. Key commuting destinations / origins include the neighbouring authority areas of Coventry, Daventry, Harborough, Nuneaton and Bedworth, and Warwick.

3.4.11 In addition, European sites beyond 10km of the Plan area but within the key commuting areas which are sensitive to air quality effects are also considered within this HRA, where they are linked to the Plan area via key strategic road links. These are road links which provide a clear route linking residential and employment areas within the Plan area. A 10km buffer from the Plan area is considered precautionary as it encompasses the key commuting areas and strategic road links that connect to the Plan area.

Are the qualifying features of sites within 200m of a road sensitive to air pollution?

3.4.12 It is widely accepted that air quality impacts are greatest within 200m of a road source, decreasing with distance^{31,32,33}. Baseline mapping data has been used to determine the proximity of European sites, and their qualifying features, to roads (within 200m) which may result in an exceedance of Natural England's screening thresholds.

3.4.13 The UK Air Pollution Information System (APIS) provides information on all European sites and the sensitivity of their qualifying features (habitats and / or species) to air pollution. This data has been interrogated, alongside a desk-based review of site-based data (**Appendix B**), to determine whether there may be impact pathways from the Local Plan to any European site through a change in atmospheric emissions.

3.4.14 As shown in **Table 3.1**, there is one European site located within 10km of the Plan area (which corresponds to the key commuting area) – Ensor's Pool SAC. This SAC is not sensitive to air quality impacts and is not located within 200m of a strategic road link. Air quality impact pathways to Ensor's Pool SAC can therefore be scoped out of the HRA process, and no further assessment is required.

3.5 Water quality and water quantity

3.5.1 Urban development coming forward through the Local Plan has the ability to affect water-dependent European sites through a number of impacts as listed below. These impacts have the potential to change the water balance (levels) and quality of water entering European sites:

- Change in surface permeability and run off rates;
- Increased water demand to supply new homes and businesses;
- Reduce quality of surface water run off; and
- Increased effluent discharge for treatment.

³⁰ Office for National Statistics (2011) Location of usual residence and place of work by method of travel to work (2001 specification). Travel by car or van only. Available at: <https://www.nomisweb.co.uk/census/2011/WU03UK/chart/1132462281> [Date accessed: 04/12/25].

³¹ The Highways Agency, Transport Scotland, Welsh Assembly Government, The Department for Regional Development Northern Ireland (2007) Design Manual for Roads and Bridges, Volume 11, Section 3, Part 1: Air Quality.

³² Natural England (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report NECR 199.

³³ Bignal, K., Ashmore, M. & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

- 3.5.2 The Water Framework Directive (WFD) provides an indication of the health of the water environment and whether a water body is at a good status or potential. This is determined through an assessment of a range of elements relating to the biology and chemical quality of surface waters and quantitative and chemical quality of groundwater. To achieve good ecological status or potential, good chemical status or good groundwater status, every element assessed must be at good status or better. If one element is below its threshold for good status, then the status for the whole water body is classed below good. Surface water bodies can be classed as high, good, moderate, poor or bad status.
- 3.5.3 The WFD sets out areas which require special protection. These include areas designated for *“the protection of habitats or species where the maintenance or improvement of the status of water is an important factor in their protection including relevant Natura 2000 sites designated under Directive 92/43/EEC (the Habitats Directive) and Directive 79/409/EEC (the Birds Directive)”*³⁴.
- 3.5.4 The main watercourse running through the Plan area is the River Avon which flows in a westerly direction across the central area of the borough, through the town of Rugby towards its confluence with the River Severn near Tewkesbury. Key tributaries of the River Avon within the Plan area include Clifton Brook, the River Swift and Sow Brook.
- 3.5.5 The River Leam flows in a westerly direction across the southern area of the borough towards its confluence with the River Avon near Warwick. Tributaries of the River Avon within the Plan area include Millholme Brook and Rains Brook. The River Anker originates in the northern area of the borough, near Wolvey and flows in a north-westerly direction towards Nuneaton. Sketchley Brook and Harrow Brook flow by the northern boundary, and there are also canals within the borough. The Oxford Canal connects the town of Rugby with Coventry, the Grand Union Canal crosses through the south of the borough, and the Ashby-de-la-Zouch Canal crosses through the north of the borough.
- 3.5.6 The Local Plan administrative area falls predominantly within the Severn River Basin District, with a small area to the north of the Plan area falling within the Humber River Basin District. These River Basin Districts are sub-divided into several surface water management catchments (SWMCs)³⁵. The Plan area is located predominantly within the Avon and Warwickshire SWMC, with small sections of the Plan area to the north located within the Soar SWMC and Tame, Anker and Mease SWMC, as illustrated in **Figure 3.3**.
- 3.5.7 It is noted that the Plan area does not lie within the River Mease SAC nutrient neutrality catchment³⁶.

³⁴ Official Journal of the European Communities (2000) Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy. Available at: https://eur-lex.europa.eu/resource.html?uri=cellar:5c835afb-2ec6-4577-bdf8-756d3d694eeb.0004.02/DOC_1&format=PDF [Date accessed: 03/12/25].

³⁵ Department for Environment Food & Rural Affairs. River basin districts, England. Available at: <https://environment.data.gov.uk/catchment-planning/> [Date accessed: 03/12/25].

³⁶ Note: the Local Plan area is not located within the River Mease SAC nutrient neutrality catchment. WOOD, A., WAKE, H. and MCKENDRICK-SMITH, K. 2022. River Mease Special Area of Conservation – Evidence Pack. Natural England Technical Information Note. TIN200 Natural England. Available at: <http://publications.naturalengland.org.uk/publication/5254733043597312> [Date accessed: 03/12/25].

- 3.5.8 River Basin Management Plans (RBMPs) provide a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, they also inform decisions on land-use planning. **Appendix A** provides a summary of the Severn and Humber RBMPs and HRAs which were prepared to support these plans.
- 3.5.9 Catchment Abstraction Management Plans (CAMS) are six-year strategies developed by the Environment Agency (EA) for managing water resources at the local level, produced for every river catchment area in England and Wales. Through the CAMS process, the EA prepares an Abstraction Licensing Strategy (ALS) to manage water resources and contribute to implementation of the WFD. ALSs feed into Water Resource Management Plans (WRMPs) in terms of determining and managing current and future pressures on water resources and how this will be managed by the relevant water companies.
- 3.5.10 The Plan area is located predominantly within the Warwickshire Avon ALS catchment³⁷, with a small area to the north east within the Soar³⁸, and a small area to the north within the Tame, Anker and Mease³⁹ abstraction licensing strategy areas. Only the Tame, Anker and Mease ALS catchment contains European sites: River Mease SAC and Ensor's Pool SAC. The strategies for these areas set out how water resources are used, indicating areas where water is available for further abstraction. The Warwickshire Avon ALS encompasses the River Avon, with water being abstracted predominantly for public water supply, agriculture and industry. Within the catchment, the ALS indicates a Hands-off-Flow (HoF)⁴⁰ of 2,568 ml/d at the lower end of the River Severn at Deerhurst gauging station to safeguard flows⁴¹.
- 3.5.11 For the purposes of water resource planning and supply, the country is divided into Water Resource Zones (WRZs). WRZs are defined by the EA as the "*largest possible zone in which customers share the same risk of a resource shortfall*"⁴². These WRZs have been amalgamated into larger sub-regional supply areas. The Plan area is served by the Strategic Grid WRZ as supplied by Severn Trent Water (see **Figure 3.4**).

³⁷ Environment Agency (2023) Warwickshire Avon Abstraction Licensing Strategy. Available at: <https://assets.publishing.service.gov.uk/media/642e90bc7de82b0012313726/Warwickshire-Avon-ALS.pdf> [Date accessed: 03/12/25].

³⁸ Environment Agency (2020) Soar Abstraction Licensing Strategy. Available at: https://assets.publishing.service.gov.uk/media/5f574829e90e070995ad8255/Soar_Abstraction_Licensing_Strategy.pdf [Date accessed: 03/12/25].

³⁹ Environment Agency (2022) Tame, Anker and Mease Abstraction Licensing Strategy. Available at: <https://assets.publishing.service.gov.uk/media/62b418848fa8f53572e3db13/Tame-Anker-and-Mease-abstraction-licensing-strategy.pdf> [Date accessed: 04/12/25].

⁴⁰ HoF is a condition attached to an abstraction licence which states that if a river flow falls below the level specified on the licence, the abstractor will be required to reduce or stop the abstraction.

⁴¹ JBA Consulting (2024) Coventry and Warwickshire Sub-Regional Water Cycle Study – Stage 1. Available at: <https://www.southwarwickshire.org.uk/doc/213040/name/Water%20Cycle%20Study%20Final%20Draft.pdf> [Date accessed: 04/12/25].

⁴² Severn Trent. A1 Water Resource Zones. Available at: https://www.severntrent.com/content/dam/stw/ST_Corporate/About_us/Docs/Appendix-A-How-much-water-do-we-have-available.pdf [Date accessed: 04/12/25].

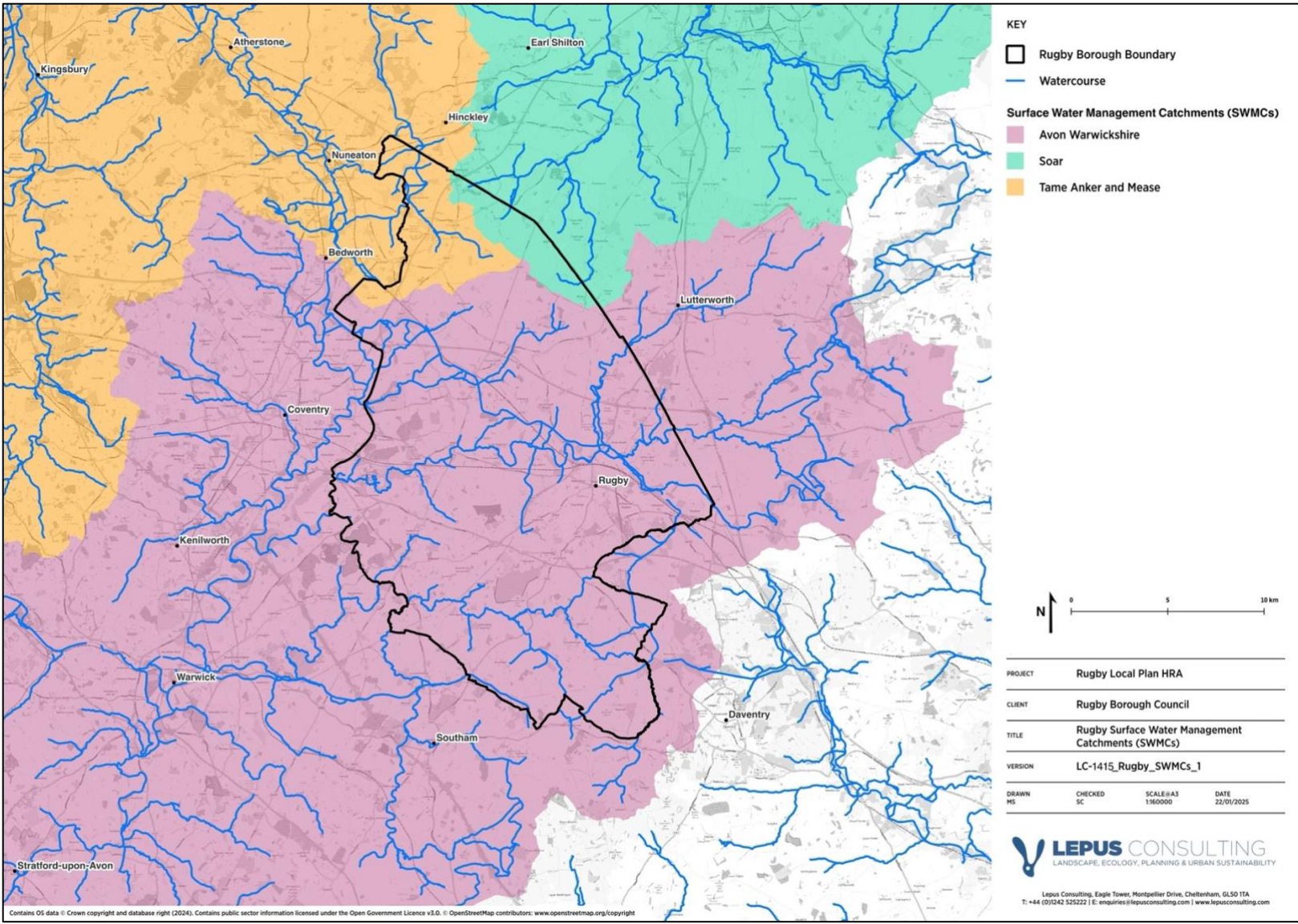


Figure 3.3: Surface Water Management Catchments within the Plan area

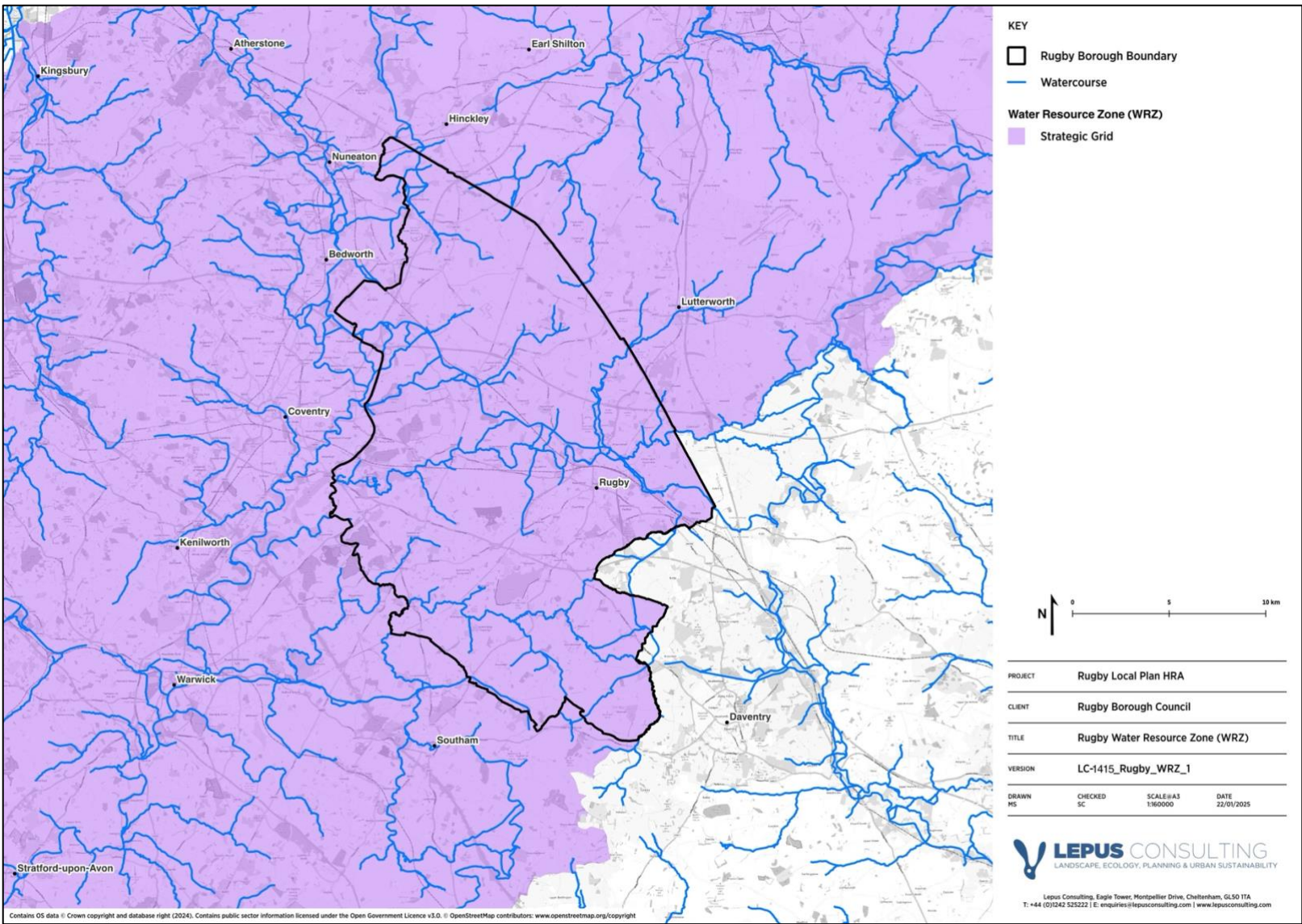


Figure 3.4: Water Resource Zone within the Plan area

- 3.5.12 Decisions relating to water abstraction for supply and disposal of water are controlled through a number of licensing mechanisms and a high-level water planning framework which is subject to HRA. This ensures the protection of the water environment and compliance with the WFD.
- 3.5.13 The water service provider for the Plan area is Severn Trent Water (STW). It is a statutory requirement that every five years water companies produce and publish a WRMP. A WRMP demonstrates long term plans to accommodate the impacts of population growth, drought, environmental obligations and climate change uncertainty in order to balance supply and demand.
- 3.5.14 STW's WRMP (known as WRMP24)⁴³ was published in April 2025. It identifies a significant long-term supply-demand deficit within the WRZ. The WRMP therefore outlines a number of demand management measures that need to be taken to ensure continued sustainable sources of water supply. The Local Plan Water Cycle Study (WCS)⁴⁴ identifies water resources as under significant pressure, and emphasises the importance of new developments not contributing to an unsustainable increase in water abstraction. The study sets out provisions to help achieve the Government's ambition of 110 litres per day per person by 2050 including universal metering, reducing leakage by 50%, delivering the customer water efficiency plan, and Government water labelling. The study also recommends that Local Planning Authorities (LPAs) should encourage developers to go beyond building regulations, supported by STW's incentives for water-efficient design in new builds. Growth during the Local Plan period is expected to be approximately 10,812 dwellings (Policy S2), with higher figures of up to 18,628 homes tested in the WCS growth scenarios⁴⁵. When compared with the much larger population increase forecast across STW's Strategic Grid WRZ, (approximately 1.1 million additional people over the next 25 years), Rugby's growth represents only a small proportion of total WRZ-wide demand growth. The Council has been in ongoing liaison with the water companies throughout the plan making process to ensure that appropriate and sufficient supply can be made for infrastructure, and that the emerging growth proposals can be supported. This forms part of the Duty to Cooperate on strategic cross-border issues and will inform the Infrastructure Delivery Plan which forms a critical component of the Local Plan evidence base.
- 3.5.15 The Water Industry Act 1991, as amended by the Water Act 2003, made it a statutory requirement for water companies to produce and maintain a Drought Plan every 5 years. A Drought Plan sets out the framework for a water company to follow in times of drought and dry weather to maintain water supply and links strategically with the WRMPs. The STW Drought Plan⁴⁶ tests a number of drought / dry weather scenarios under different climatic conditions to show that supply can be maintained.
- 3.5.16 As set out in **paragraph 3.5.9**, abstractions for water supply are managed by the EA through licences issued in line with their CAMS process.

⁴³ Severn Trent Water (2024), Water Resources Management Plan. Available at <https://www.severntrent.com/about-us/our-plans/water-resources-management-plan/wrmp24-final-documents/> [Date accessed: 05/12/25].

⁴⁴ JBA Consulting (2025) Coventry and Warwickshire Sub-Regional Water Cycle Study – Stage 2.

⁴⁵ JBA Consulting (2025) Coventry and Warwickshire Sub-Regional Water Cycle Study – Stage 2.

⁴⁶ Severn Trent Water (2022) Drought Plan 2022-2027. Available at: <https://www.severntrent.com/content/dam/stw-plc/water-resource-zones/drought-plan-2022-2027.pdf> [Date accessed: 04/12/25].

- 3.5.17 WRMPs are linked to Drought Plans which detail the steps that would be taken to ensure supplies can be maintained whilst minimising the impacts to rivers and the environment during drought events. The STW Drought Plan covers the period from 2027 to 2032⁴⁷ and sets out a series of actions to address droughts, including to reduce customer demand for water, and identifies catchments (including the River Avon) where drought orders and permits may be required.
- 3.5.18 STW provides wastewater services to the Plan area. Sewerage Undertakers have a duty under Section 94 of the Water Industry Act 1991 to provide sewerage and treat wastewater arising from new domestic development.
- 3.5.19 A Stage 1 WCS⁴⁸ was undertaken on behalf of LPAs within the sub-region including Rugby Borough Council⁴⁹. This study assesses the impacts on water supply, wastewater collection and treatment and water quality from future Local Plan development. STW provided an assessment of Wastewater Treatment Works (WwTWs) serving growth in the Plan area based on hydraulic capacity and headroom in the environmental permit. The WCS also contains a flow permit assessment. This identified that whilst proposed growth in the sub-region can be accommodated at a number of WwTW, some treatment works may require upgrades to ensure growth can occur without causing flow permits to be exceeded.
- 3.5.20 The WCS identified receptors to changes in water quality as a result of discharge from effluent at WwTWs into the water environment. A Stage 2 WCS⁵⁰ has also been prepared, which builds on the 'Warwickshire sub-regional' Phase 1 WCS, to specifically support the Rugby Local Plan. It provides a detailed assessment of water resources and supply and wastewater treatment and has informed the assessments made in this HRA report.
- 3.5.21 As noted in **paragraph 3.5.6**, the Plan area predominantly falls within hydrological catchments associated with the Severn Estuary and to a lesser extent the Humber Estuary. The Severn Estuary SAC and Severn Estuary Ramsar are hydrologically linked to the Plan area via the River Avon which is a tributary of the River Severn. The Humber Estuary SAC and Humber Estuary Ramsar are linked to the Plan area via the Sence, Anker and Bourne Rivers and Lakes and Blythe Rivers operational catchments.
- 3.5.22 The qualifying features of the Severn Estuary SAC include, among other features, a number of species of migratory fish including Twaite Shad (*Alosa fallax*), River Lamprey (*Lampetra fluviatilis*) and Sea Lamprey (*Petromyzon marinus*). Criterion 4 of the Severn Estuary Ramsar designation notes that the site is important for the run of migratory fish between sea and river via estuary, including the SAC species and additionally species of Salmon (*Salmo salar*), Sea Trout (*S. trutta*), Allis Shad (*Alosa alosa*) and European eel (*Anguilla anguilla*).

⁴⁷ Severn Trent Water (2027) Final Drought Plan.

⁴⁸ JBA Consulting (2024) Coventry and Warwickshire Sub-Regional Water Cycle Study – Stage 1.

⁴⁹ LPAs included Nuneaton and Bedworth Borough Council, Coventry City Council, Rugby Borough Council, Warwick District Council, North Warwickshire Borough Council and Stratford-on-Avon District Council.

⁵⁰ JBA Consulting (2025) Rugby Borough Council Water Cycle Study Stage 2. 30 November 2025.

- 3.5.23 The 'Unlocking the Severn' project⁵¹, which is run in partnership between the Canal and Rivers Trust, the Severn Rivers Trust, the EA and Natural England, has created four new fish passes along the River Severn in Worcestershire to allow fish to migrate upstream. Work is also being undertaken as part of the project to monitor fish. This has shown that sufficient numbers of Twaite Shad can pass weir barriers aided by the tides. The River Severn RBMP sets out several catchment partnership measures for the Warwickshire Avon catchment, which include creation of fish passes to reduce barriers to fish movement further up the River Severn catchment⁵².
- 3.5.24 Communication with Natural England⁵³ has indicated that migratory fish species associated with the Humber Estuary SAC and the Humber Estuary Ramsar include Sea Lamprey and River Lamprey. The River Lamprey has been recorded as far upstream as the River Dove (on the Staffordshire/Derbyshire border).
- 3.5.25 Any potential deterioration in water quality or habitat outside the Severn Estuary SAC and Ramsar or the Humber Estuary SAC and Ramsar as a result of the Local Plan may have implications for the migration of fish to upstream spawning habitat if it results in a barrier to movement. The impact of the Local Plan upon functionally linked watercourses and habitat through a deterioration in water quality, flows and loss and / or deterioration of riparian and in-stream habitat may therefore have adverse effects on the achievement of the conservation objectives which aim to maintain and restore the condition of these features for relevant qualifying species. Natural England consider that Good Ecological Status under the WFD is an appropriate standard for functionally linked watercourses⁵⁴.
- 3.5.26 In developing its WRMP24, STW examined the future forecast water supply/demand balance and determined how any deficit between forecast demand and reliable water supply availability should be addressed. STW identified 38 options within its preferred WRMP. Through the HRA process supporting the preparation of the WRMP⁵⁵, 19 preferred plan options were screened out. A total of 19 options were identified as requiring an AA for construction and/or operation.
- 3.5.27 The HRA evaluated the combined (in-combination) effects of the WRMP options, including potential impacts on the River Trent as a functionally linked watercourse to the Humber Estuary SAC, SPA, and Ramsar site. Its functional linkage specifically relates to migratory fish and freshwater inputs to the estuary. The assessment also considered potential effects on the Severn Estuary SAC, SPA, and Ramsar site, together with associated functionally linked watercourses.

⁵¹ Rivers and Canals Trust. Unlocking the Seven Project. Available at: <https://unlockingthesevern.co.uk/our-fish-passes/> [Date accessed: 03/12/25].

⁵² Environment Agency (2022) Severn River Basin Management Plan. Available at: <https://www.gov.uk/guidance/severn-river-basin-district-river-basin-management-plan-updated-202> [Date accessed: 04/12/25].

⁵³ JNCC. Humber Estuary. Available at: <https://sac.jncc.gov.uk/site/UK0030170> [Date accessed: 10/12/25].

⁵⁴ Defra. 2014. Water Framework Directive implementation in England and Wales: new and updated standards to protect the water environment (publishing.service.gov.uk). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/307788/river-basin-planning-standards.pdf [Date accessed: 04/12/25].

⁵⁵ Severn Trent Water (2025) Habitats Regulations Assessment. Final Water Resources Management Plan 2024 Information to support an assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017

- 3.5.28 The HRA AA for the WRMP water supply options concluded that established standards and best-practice construction mitigation measures are sufficient to avoid adverse effects upon these European sites. For several options, the need for further hydrological assessment and surveys to confirm the presence and use of offsite functionally linked watercourses was identified prior to project-level HRAs. Additional mitigation, such as restrictions on abstraction licence volumes and timing, and reviews of HoF requirements, was also identified as necessary to ensure no adverse effects occur.
- 3.5.29 The WRMP is based on population projections and forecasts to 2050-2051, which includes Rugby. It can, therefore, be concluded that the Local Plan will not result in a likely significant effect on any European sites from increased water demand, either alone or in combination with all other new plans and projects that would be served by the public water supply. Water quantity impacts can consequently be scoped out of the HRA process.
- 3.5.30 Taking into consideration potential changes in water quality (through surface water run-off and discharges from WwTWs), European sites were screened for potential hydrological impact pathways. This review looked at European sites which are hydrologically linked to the Plan area and hydrologically sensitive, including impacts upon functionally linked watercourses. **Table 3.3** indicates those European sites that will be scoped into the screening assessment (**Chapter 4**) for further consideration in the HRA process in terms of water quality impacts.

Table 3.2: Review of hydrological impact pathways to European sites within the influence of the Local Plan

European site name	Is the European site sensitive to a change in water quality and is it hydrologically connected to the Plan area?	Will the European site be scoped in for further assessment in the HRA process?
Ensor's Pool SAC	<p>Ensor's Pool SAC lies on the western edge of Nuneaton in the north of Warwickshire and formed in an abandoned clay pit and is groundwater fed. Its qualifying feature is native White-Clawed Crayfish (<i>Austropotamobius pallipes</i>). The SIP for the SAC does not identify water quality or water quantity issues as a threat at the SAC56.</p> <p>As part of the HRA work undertaken in support of the adopted Warwickshire Minerals Plan HRA, the EA recommended application of a 3km catchment within which water impacts are likely⁵⁷. Taking into account the distance of the SAC from the Plan area (approximately 4km to the west) and the fact that the SAC is groundwater fed, there are unlikely to be water receptors that connect development proposed in the Local Plan with the SAC.</p>	No
River Mease SAC	The River Mease SAC is designated for a number of river qualifying habitats, White Clawed Crayfish; Spined Loach (<i>Cobitis taenia</i>); Bullhead (<i>Cottus gobio</i>); and Otter (<i>Lutra lutra</i>). The Plan area does not	No

⁵⁶ Natural England (2014) Site Improvement Plan: Ensor's Pool. Available at: <https://publications.naturalengland.org.uk/publication/5364843502632960> [Date accessed: 04/12/25].

⁵⁷ Warwickshire County Council (2021). Habitats Regulations Assessment. SCREENING DECISION AND APPROPRIATE ASSESSMENT UPDATED, September 2021. <https://www.warwickshire.gov.uk/mineral-waste-plans/minerals-development-framework/> Available at: [Date accessed: 04/12/25].

European site name	Is the European site sensitive to a change in water quality and is it hydrologically connected to the Plan area?	Will the European site be scoped in for further assessment in the HRA process?
	lie within the River Mease SAC nutrient neutrality catchment ⁵⁸ and is not hydrologically linked to the Plan area.	
Severn Estuary SAC	<p>The Plan area is predominantly located within the River Severn District Basin and the Avon Warwickshire SWMC. The Severn Estuary SAC is located downstream of the Plan area and connected via the River Avon (and its tributaries) which meets the River Severn at Tewkesbury.</p> <p>The qualifying features of the SAC are likely to use watercourses upstream of the designations for certain stages of their life cycle (e.g. spawning), therefore functionally linked watercourses are potentially located within / connected to the Plan area. The SAC is therefore likely to be sensitive to changes in water quality as a result of development associated with the Local Plan and will be scoped in for further assessment.</p>	Yes
Severn Estuary Ramsar	<p>The Plan area is predominantly located within the River Severn District Basin and the Avon Warwickshire SWMC. The Severn Estuary Ramsar is located downstream of the Plan area and connected via the River Avon (and its tributaries) which meets the River Severn at Tewkesbury.</p> <p>The qualifying features of the SAC and Ramsar are likely to use watercourses upstream of the designations for certain stages of their life cycle (e.g. spawning) and therefore functionally linked watercourses are potentially located within / connected to the Plan area. The Ramsar is therefore likely to be sensitive to changes in water quality as a result of development associated with the Local Plan and will be scoped in for further assessment.</p>	Yes
Humber Estuary SAC	<p>A small area of the Plan area is located within the Humber River District Basin and the Soar and Tame Anker Mease SWMCs. The Humber Estuary SAC is located downstream of the Plan area and connected via the River Soar which meets the River Trent at Trent Lock, Derbyshire, and ultimately feeds into the Humber Estuary.</p> <p>The qualifying features of the SAC are likely to use watercourses upstream of the designations for certain stages of their life cycle (e.g. spawning) and therefore functionally linked watercourses are potentially located within / connected to the Plan area.</p>	Yes
Humber Estuary Ramsar	<p>A small area of the Plan area is located within the Humber River District Basin and the Soar and Tame Anker Mease SWMCs. The Humber Estuary SAC is located downstream of the Plan area and connected via the River Soar which meets the River Trent at Trent Lock, Derbyshire, and ultimately feeds into the Humber Estuary.</p> <p>The qualifying features of the Ramsar are likely to use watercourses upstream of the designations for certain stages of their life cycle (e.g.</p>	Yes

⁵⁸ Note: the Local Plan area is not located within the River Mease SAC nutrient neutrality catchment. WOOD, A., WAKE, H. and MCKENDRICK-SMITH, K. 2022. River Mease Special Area of Conservation – Evidence Pack. Natural England Technical Information Note. TIN200 Natural England. Available at: <http://publications.naturalengland.org.uk/publication/5254733043597312> [Date accessed: 04/12/25].

European site name	Is the European site sensitive to a change in water quality and is it hydrologically connected to the Plan area?	Will the European site be scoped in for further assessment in the HRA process?
	spawning) and therefore functionally linked watercourses are potentially located within / connected to the Plan area.	

3.6 Recreational pressure

- 3.6.1 Increased recreational pressure at European sites can result in damage to habitats through erosion and compaction, troubling of grazing stock, causing changes in behaviour to animals such as birds at nesting and feeding sites, spreading invasive species, dog fouling and tree climbing etc.
- 3.6.2 A common approach taken across the UK to address recreational impacts at European sites is to establish a buffer zone or Zone of Influence (ZOI) based on detailed visitor survey data. The ZOI is the area within which there are likely to be significant effects arising from recreational activities undertaken by additional residents due to growth. This is often calculated by taking the distance at which 75% of interviewees surveyed have travelled to reach a particular site (based on a review of visitor survey data). Where available, buffer distances have been applied to determine potential pathways of recreational and urbanisation effects from the Local Plan.
- 3.6.3 The broad principle of buffer zones is one component of the HRA screening process for recreational pressures. The recreational draw of a European site depends on a number of factors. These include the extent and range of facilities provided (in particular parking), accessibility both within the European site and links to the wider area, incorporation of a European site as part of a wider designation, such as a National Park, and the site's promotion. A review of recreational impact assessments undertaken for other European sites across the UK indicates visitors typically live within 4.2 km (overall median value) of nature conservation sites and that the majority (75%) live within 12.6 km⁵⁹. However, this review recognises that some visitors are prepared to travel longer distances to visit particular sites, for instance coastal and wetland sites.
- 3.6.4 As such, a precautionary distance of 15km has been applied to the scoping of European sites which may be sensitive to potential recreational impact pathways. This scoping exercise is detailed in the following paragraphs and draws on a review of Natural England data which identifies vulnerabilities at each European site (**Appendix B**).

⁵⁹ Weitowitz, D, C. Panter, C. Hoskin, R. and Liley, D. (October 2019) The effect of urban development on visitor numbers to nearby protected nature conservation sites. Journal of Urban Ecology, Volume 5, Issue 1.

- 3.6.5 There is one European site located within 15km of the Plan Area: Ensor's Pool SAC. This SAC lies within the Ensor's Pool Nature Reserve on the western edge of Nuneaton in the north of Warwickshire and is formed in an abandoned clay pit. It is located within an urban setting. The SAC was designated as it supported a large population of White-Clawed Crayfish. Recent surveys have however recorded no crayfish in the pool, the cause of which may be associated with the spread of 'Crayfish Plague'⁶⁰. Whilst there are footpaths which run within the Nature Reserve, recreational impacts are not identified as a threat/pressure at the SAC within the SIP or Natural England's supplementary advice. Although angling is prohibited on Ensor's Pool, unauthorised fishing does take place⁶¹. Given the location of Ensor's Pool SAC within the 15km recreational impact pathway buffer (4km from the Plan boundary), and the potential for unauthorised recreational activity, the SAC will be scoped in for recreational LSEs.

3.7 Urbanisation effects

- 3.7.1 Urbanisation effects typically occur when development is located close to a European site boundary. These may include impacts such as noise disturbance, lighting effects, cat predation, fly-tipping, wildfire, littering and vandalism. Strategic mitigation schemes elsewhere in the UK have set a presumption against development (i.e. no net increase in residential dwellings) on the basis of site-specific evidence to safeguard against these impacts of approximately 400m. There are no European sites located within 400m of the Plan area, with the closest being Ensor's Pool SAC located 4km to its west. Therefore, the Local Plan is unlikely to have an urbanisation effect upon any European site, and this impact pathway can be scoped out.

3.8 European sites and threats and pressures

- 3.8.1 The impact pathways which have the potential to affect European sites listed in **Table 3.1** are summarised in **Table 3.3**. These will form the basis of the HRA screening assessment.

⁶⁰ David Rogers Associated (2015) White-clawed crayfish survey for Ensor's Pool SSSI/SAC (Warwickshire). Natural England Publication IPENS065. Available at: <https://publications.naturalengland.org.uk/publication/6577286383927296> [Date accessed: 04/12/25].

⁶¹ Natural England and other parties (2015) White-clawed crayfish survey for Ensor's Pool SSSI/SAC (Warwickshire). Improvement Programme for England's Natura 2000 Sites (IPENS) – Planning for the Future IPENS065.

Table 3.3: Summary of impact pathways to European sites which may be associated with the Local Plan

European site name	Air Pollution Impact Pathway?	Water Quality Impact Pathway?	Water Quantity Impact Pathway?	Recreational Pressure Impact Pathway?	Urbanisation Impact Pathway?
Ensor's Pool SAC	No	No	No	Yes	No
Humber Estuary Ramsar	No	Yes	No	No	No
Humber Estuary SAC	No	Yes	No	No	No
Humber Estuary SPA	No	No	No	No	No
River Mease SAC	No	No	No	No	No
Severn Estuary Ramsar	No	Yes	No	No	No
Severn Estuary SAC	No	Yes	No	No	No
Severn Estuary SPA	No	No	No	No	No

4 Screening Preferred Options

4.1 Introduction

4.1.1 This section of the HRA comprises the screening stage: Stage 1 of the HRA process (see **Figure 2.1**). The screening exercise draws on information regarding threats and pressures at European sites scoped into the HRA process in **Chapter 3** of this report. This chapter updates the screening assessment that was undertaken of the Regulation 18 Preferred Options draft (see **Section 1.3**), and re-screens each component of the Proposed Submission Draft Local Plan for LSEs and identifies the requirement for AA.

4.2 Screening

4.2.1 The Local Plan is not directly connected with or necessary to the management of any European site and as such it is not exempted from the HRA process. In addition, it cannot be excluded or eliminated from the process on the basis of no conceivable effect. It is therefore necessary to determine whether the Local Plan will have an LSE on any European site, either alone or in-combination with other aspects of the Local Plan or other plans and projects.

4.2.2 In order to identify LSEs upon European sites, each component of the Proposed Submission Draft Local Plan has been appraised against the HRA screening criteria (see **Appendix C**), taking into consideration case law and best practice. The assessment of LSEs takes no account of mitigation to ensure compliance with the People Over Wind ruling⁶².

4.2.3 It is concluded that LSEs, from either the Local Plan alone or in combination with other plans or projects, could be screened out for a number of components. This is because they fell into the following categories (see **Table 2.1** for a description of each category):

- Category B: Policies listing general criteria for testing the acceptability / sustainability of proposals;
- Category D: Environmental protection / site safeguarding; or
- Category F: Policies or proposals that cannot lead to development or other change.

4.2.4 The following components in the Local Plan set out in **Table 4.1** were however considered to have an LSE in combination with other plans and projects (Category L).

⁶² InfoCuria (2018) Case C-323/17. Available at:
<http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN> [Date accessed: 04/12/25].

Table 4.1: Summary of screened in components of the Local Plan

(Note: only components screened into the HRA process have been included in the summary table below. The screening outcome for all components is provided at **Appendix C**)

Policy Number	Policy Name	Screening Category
S2	Strategy for homes	L
S3	Strategy for employment land	L
S4	Sites for Gypsies and Travellers	L
S6	Residential allocation	L
S7	Employment allocations	L
S8	South West Rugby	L
S9	South West Rugby spine road network	L
C1	Rugby town centre	L

4.2.5 Likely significant in-combination water quality effects were identified for all development allocations (**Figures C.1 to C.3**) at functionally linked watercourses associated with the Severn Estuary SAC, Severn Estuary Ramsar, Humber Estuary SAC and Humber Estuary Ramsar and for all allocations in terms of potential recreational LSEs at Ensor's Pool SAC.

4.2.6 As required under Regulation 105 of the Habitats Regulations, an assessment has been undertaken of LSEs of the Local Plan upon European sites. The screening evaluation (**Appendix C**) indicates that the Local Plan has the potential to have LSEs at the above European sites. The screening assessment takes no account of mitigation measures that the Local Plan may incorporate to mitigate adverse impacts upon European sites. It is therefore concluded that the Local Plan will be screened into the HRA process. The Local Plan therefore progresses to the next stage of the HRA process: AA.

5 Water Quality Appropriate Assessment

5.1 Introduction

5.1.1 This chapter of the AA evaluates the potential ecological effects arising from a deterioration in water quality linked to growth associated with the Local Plan, considering each European site in light of its conservation objectives.

5.1.2 The HRA screening process in **Chapter 4** concluded that a number of Local Plan policies and all allocations have the potential to result in likely significant hydrological impacts at functionally linked watercourses associated with the Severn Estuary SAC, Severn Estuary Ramsar, Humber Estuary SAC and Humber Estuary Ramsar. They were screened into the HRA process and all allocations.

- Policy S2 – Strategy for homes;
- Policy S3 – Strategy for employment land;
- Policy S4 – Sites for Gypsies and Travellers;
- Policy S6 – Residential allocations;
- Policy S7 – Employment allocations;
- Policy S8 – South West Rugby;
- Policy S9 – South West Rugby spine road network; and
- Policy C1 – Rugby town centre.

5.1.3 As noted in **Section 3.5**, development has the potential to reduce the quality of water entering a catchment through processes such as sedimentation, accidental spillage of chemicals and materials and operational surface water runoff. Water quality may also be reduced through effluent discharges at WWTWs. This change in water quality can increase nutrient inputs into a catchment which can lead to algal blooms, reduce dissolved oxygen and increase turbidity. This can affect the overall condition of the receiving waterbody and may have adverse effects at hydrologically sensitive and connected European sites and their qualifying features.

5.1.4 Together the Government, the EA and the water companies are responsible for preparing plans and strategies and implementing a regulatory framework to ensure there is enough water for the future needs of both people and the environment and manage the treatment of wastewater. This is undertaken through a catchment-based approach and provides protection for European sites and ensures compliance with the WFD⁶³.

5.1.5 The WFD provides an indication of the health of the water environment and whether a water body is at good status or potential. This is determined through an assessment of a range of elements relating to the biology and chemical quality of surface waters and quantitative and chemical quality of groundwater. To achieve a good ecological status or potential, good chemical status or good groundwater status every single element assessed must be at a good status or better. If one element is below its threshold for good status, then the whole water body's status is classed below good. Surface water bodies can be classed as high, good, moderate, poor or bad status.

⁶³ https://environment.ec.europa.eu/topics/water/water-framework-directive_en.

5.1.6 The scoping assessment (presented in **Chapter 3**) identified water quality LSEs at functionally linked watercourses associated with the following four European sites:

- Humber Estuary SAC;
- Humber Estuary Ramsar;
- Severn Estuary SAC; and
- Severn Estuary Ramsar.

5.2 Mitigation

5.2.1 Policy CL3 of the Local Plan: Water Supply, Quality and Efficiency (**Box 1**) directly regulates water efficiency standards for new development, reducing risk of deterioration in downstream receiving waters.

Box 1: Policy CL3: Water Supply, Quality and Efficiency

- A. New development shall minimise the need for new infrastructure by being located where there is guaranteed and adequate water supply.
- B. New development must not either directly or indirectly through overloading wastewater treatment works result in adverse impacts on the quality of waterbodies, groundwater, or surface water, nor prevent waterbodies from achieving a good ecological and chemical status in the future. Any required upgrades to wastewater infrastructure will need to be completed before the development is occupied.
- C. New dwellings shall demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling, as calculated in accordance with the methodology in the water efficiency calculator, does not exceed 110 litres per person per day in line with regulation 36(2)(b) of the Building Regulations 2010 (as amended).
- D. New non-residential development that is major development shall achieve full credits for category Wat 01 of BREEAM, unless demonstrated impracticable.

5.2.2 Text supporting this policy noted that *“proposals should take into account Severn Trent’s Water Resource Management Plan and Strategic Business Plan as well as the findings of the Water Cycle Study and the River Basin Management Plan prepared by the Environment Agency (or updated versions of the same)”*.

5.2.3 Policy D5 of the Local Plan: Sustainable Drainage (**Box 2**) requires all development to incorporate Sustainable Drainage Systems (SuDS) in accordance with national standards, reducing diffuse pollution and sedimentation entering watercourses and therefore mitigating hydrological changes that could affect European sites.

Box 2: Policy D5: Sustainable Drainage

- A. All developments that create a need for surface water drainage shall include Sustainable Drainage Systems (SuDs) for the management of surface water runoff

B. SuDS shall:

- i. be located outside the floodplain;
- ii. integrate with green infrastructure;
- iii. be sufficient for the needs of the site;
- iv. promote enhanced biodiversity;
- v. improve water quality; and
- vi. provide good quality open spaces.

C. Infiltration SuDS are preferred. The developer shall carry out infiltration tests and a groundwater risk assessment to ensure that this is possible without polluting groundwater.

D. Where it is proven that infiltration is not possible, surface water should be discharged into a watercourse at pre-development greenfield runoff rates or into a surface water sewer if there is no nearby surface water body.

E. SuDs schemes shall have a maintenance schedule detailing maintenance boundaries, responsible parties, and arrangements to ensure management in perpetuity.

F. In exceptional circumstances, where a SuDs cannot be provided, it must be demonstrated that:

- i. an acceptable means of surface water disposal is provided which does not increase the risk of flooding or give rise to environmental problems; and
- ii. if located in an area known to suffer surface water flooding, the development will contribute to an off-site strategic solution.

5.2.4

Furthermore, Policy CL4 (Climate Adaption) requires resilience to climate-driven flood risk, and includes provisions relating to integrated water management, supporting measures that stabilise hydrological regimes and reduce runoff. Policy EN1 (Biodiversity and Geodiversity Protection) prohibits development that harms ecological features, including water-dependent habitats, reinforcing obligations to avoid pollution pathways. Policy S8 (South West Rugby) is a strategic allocation ensuring integrated drainage across the site and that growth does not outpace wastewater treatment capacity. Policy EN7 (Environmental Protection and Amenity) seeks to avoid unacceptable impacts of pollution, ensuring waste handling, storage and disposal cannot cause contamination or deterioration to environmental quality including water.

5.3 Humber Estuary SAC and Humber Estuary Ramsar

- 5.3.1 The Humber Estuary is the UK's second-largest coastal plan estuary (370 km²) formed at the confluence of the River Trent and River Ouse. It consists of extensive wetland and coastal habitats and nutrient-rich sediment that supports a wide variety of wintering, passage and breeding birds (especially geese, ducks and waders)⁶⁴. The estuary and its tributaries form the receiving environment for a wide hydrological catchment that includes the Local Plan area. As noted in **paragraph 3.5.22**, migratory species of fish for which the Humber Estuary SAC and Ramsar sites have been designated have the potential to use watercourses which are hydrologically linked to the Plan area for parts of their lifecycle, notably spawning. Natural England's SIP⁶⁵ identifies water pollution and changes in water quality as a key pressure affecting the ecological condition of the Humber Estuary. Therefore, a change in the quality of water in these upstream spawning locations has the potential to adversely impact these qualifying features.
- 5.3.2 The Humber Estuary's hydrodynamics are influenced by both tidal processes and riverine inputs. Water quality within the estuary is therefore governed by inputs from the extensive upstream catchment, including agricultural runoff, urban surface-water drainage, and discharges from WwTWs. Diffuse nutrient inputs from the catchment and point-source discharges have been identified as contributing to localised water quality issues, particularly nitrogen, ammonia, an organic loading⁶⁶.
- 5.3.3 Although improvements in wastewater treatment over recent decades have contributed to improved estuarine water quality, parts of the Humber continue to experience elevated nutrient concentrations following periods of heavy rainfall, WwTWs discharges, and agricultural runoff. The Humber Region has protected sites for water quality classified under the WFD. However, consultation with the EA indicates failures of WFD standards in recent years, and identifies storm foul sewer discharges and diffuse pollution from agriculture as ongoing stressors. As a result, the upper, middle, and lower Humber is considered to have 'moderate' ecological status, indicating it requires improvement⁶⁷.
- 5.3.4 Natural England's Supplementary Advice for the Humber Estuary SAC and Ramsar highlights a need to maintain or restore water quality to levels that support estuarine habitat functioning and avoid excessive nutrient enrichment. The Advice also identifies targets relating to nutrient concentrations, dissolved oxygen levels, and contaminant levels required to support the designated features, including benthic communities and intertidal habitats.

⁶⁴ Yorkshire Marine Nature Partnership. Nd. Humber Estuary SPA. Available at: <https://yorkshiremarinenaturepartnership.org.uk/manage/marine-protected-areas/humber-estuary-spa/> [Date accessed: 04/12/25]

⁶⁵ Natural England (2014), Site Improvement Plan: Humber Estuary (SIP108). Available at <https://publications.naturalengland.org.uk/publication/5427891407945728> [Date accessed: 09/12/25].

⁶⁶ Cave, R. R., Andrews, J. E., Jickells, T. and Coombes, E. G. (2005) A review of sediment contamination by trace metals in the Humber catchment and estuary, and the implications for future estuary water quality. *Estuarine, Coastal and Shelf Science*, 62 (3). pp. 547-557. ISSN 1096-0015

⁶⁷ Environment Agency (2025), Environmental Capacity in Industrial Clusters Project, Executive Summary (July 2025). Available at <https://www.gov.uk/government/publications/environmental-capacity-for-industrial-clusters-project-summary> [Date accessed: 04/11/25].

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- 5.3.5 The outputs of the Stage 2 WCS (2025)⁶⁸ and associated water quality modelling have been used to inform this AA. The WCS was undertaken through consultation with the statutory water suppliers, the EA and neighbouring LPAs.
- 5.3.6 Increased growth can lead to a deterioration of water quality at water-sensitive European sites through either polluted surface water run off or through increased discharges from WwTWs. Under the WFD, a watercourse is not allowed to deteriorate from its current WFD classification (either as an overall watercourse or for individual elements assessed).
- 5.3.7 Effluent discharge to the water environment is controlled through an environmental permitting system which is administered by the EA. The level of discharge is determined by the EA through the issue of Environmental Permits (EPs). These ensure the receiving watercourse is not prevented from meeting its environmental objectives under the WFD, with specific regard to the physico-chemical status element of the WFD classification.
- 5.3.8 To predict water quality at European sites, detailed water quality modelling was undertaken as part of the WCS using the EA's SIMCAT model⁶⁹. This was applied to watercourses adjacent to, or as close as possible to, European sites with hydrological connectivity.
- 5.3.9 Using the Local Plan development trajectory and the growth inputs supplied for the WCS, two scenarios were assessed: the Local Plan-only, and Local Plan in combination with neighbouring local authority forecast growth scenario sharing the relevant WwTWs catchments. This ensured modelling captured the total loading that could reach the Humber Estuary SAC and Ramsar.
- 5.3.10 The model examined three physico-chemical quality elements (Biochemical Oxygen Demand, Ammonia, and Phosphate) in the upstream waterbodies and tributaries that drain into the Humber Estuary. If the model indicated a change in water quality of 10% or more, or a decrease in the WFD class, the impact on water quality was deemed significant.
- 5.3.11 The Stage 2 WCS modelling indicates that, if upstream water quality improves, planned growth would not stop the affected waterbodies from reaching WFD good ecological status in the future. A significant deterioration is, however, predicted through the water quality modelling at several WwTWs as a result of Local Plan growth. Yet, the WCS demonstrated that this could be prevented by improvements in treatment processes to Technical Achievable Limits (TAL) at WwTWs. Modelling indicates that growth at Dunchurch WwTW has the potential to cause a deterioration in WFD class, however there is no growth proposed at this WwTW in the final Local Plan growth scenario.
- 5.3.12 Where a WwTW is shared with a neighbouring authority, the WCS notes that coordination of growth plans in collaboration with STW is essential to ensure that infrastructure is in place prior to development to prevent a breach of environmental permits.
- 5.3.13 Whilst the WCS does not model the estuarine waters directly, the results indicate no significant deterioration in any river system draining to the Humber Estuary. Given the high dilution and dispersion capacity of the estuarine environment, and the absence of any upstream deterioration, the modelling indicates that no significant adverse changes to water quality would occur at the Humber Estuary SAC.

⁶⁸ JBA Consulting. Rugby Borough Council Water Cycle Study Stage 2 (2025).

⁶⁹ SIMCAT model has been developed by the Environment Agency. Further details on modelling are provided in the JBA Phase 2 WCS.

- 5.3.14 The policies set out in **Box 1** and **Box 2** will safeguard water quality associated with discharges from new development set out in the Local Plan.
- 5.3.15 Taking into consideration the protection that Local Plan policies set out in **Box 1** and **Box 2** give to water quality, outputs of the water quality modelling, and the location of allocations, it can be concluded that there will be no adverse impact on site integrity (AIOI) as a result of the Local Plan either alone or in-combination on the Humber Estuary SAC and Ramsar.

5.4 Severn Estuary SAC and Ramsar

- 5.4.1 As set out in **Section 3.5**, the Severn Estuary SAC and Ramsar is located between Wales and England with extensive intertidal mudflats and sandflats, rocky platforms and islands⁷⁰. The Severn Estuary SAC and Ramsar hosts estuaries, mudflats and sandflats not covered by seawater at low tide, Atlantic salt meadows, sandbanks covered by sea water, and reefs. The site also supports Sea Lamprey (*Petromyzon marinus*), River Lamprey (*Lampetra fluviatilis*) and Twaite Shad (*Alosa fallax*).
- 5.4.2 Similar to the Humber Estuary designations, migratory species of fish for which the Severn Estuary SAC and Ramsar sites have been designated have the potential to use watercourses which are hydrologically linked to the Plan area for parts of their lifecycle, notably spawning. A change in the quality of water in these upstream spawning locations has the potential to adversely impact these qualifying features.
- 5.4.3 As set out in **paragraph 5.3.11**, water quality modelling undertaken as part of the Stage 2 WCS indicates that growth alone will not prevent good ecological status being reached in the future should improvements in upstream water quality be made.
- 5.4.4 Whilst the WCS does not model the estuarine waters directly, the results indicate no significant deterioration in any river system draining to the Severn Estuary. Given the high dilution and dispersion capacity of the estuarine environment, and the absence of any upstream deterioration, the modelling indicates that no significant adverse changes to water quality would occur at the Severn Estuary SAC.
- 5.4.5 The policies set out in **Box 1** and **Box 2** will safeguard water quality associated with discharges from new development set out in the Local Plan.

5.5 Conclusion

- 5.5.1 Taking into consideration the protection that Local Plan policies set out in **Box 1** and **Box 2** give to water quality, outputs of the water quality modelling, and the location of allocations, it can be concluded that there will be no AIOI as a result of the Local Plan either alone or in-combination on the Severn Estuary SAC and Ramsar.

⁷⁰ UK Government. Nd. Severn Estuary SAC and SPA. Available at:
https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://assets.publishing.service.gov.uk/media/5dc1525ded915d1cfe538e44/Severn_Estuary_SAC_and_SPA_Factsheet.pdf&ved=2ahUKEwju_b2NubKGAXVJQUEAHS8sB0YQFn_oECBIQAQ&usq=AOvVaw1C6EHSU86RzAz-fz2HUmWY [Date accessed: 04/12/25]

6 Recreational Pressure Appropriate Assessment

6.1 Introduction

6.1.1 The following chapter of the AA focuses on assessing the ecological impacts of recreational pressure on the qualifying features of Ensor's Pool SAC as set out in **Section 3.6** due to growth associated with the Local Plan alone and in-combination.

6.1.2 The HRA screening process (**Chapter 4**) concluded that the following policies have the potential to result in LSEs on this SAC as a result of recreation impact pathways:

- Policy S2 – Strategy for homes;
- Policy S3 – Strategy for employment land;
- Policy S4 – Sites for Gypsies and Travellers;
- Policy S6 – Residential allocations;
- Policy S7 – Employment allocations;
- Policy S8 – South West Rugby;
- Policy S9 – South West Rugby spine road network; and
- Policy C1 – Rugby town centre.

6.2 Baseline Information

Introduction

6.2.1 As noted in **Section 3.6**, increased recreational pressure at European sites can result in damage to habitats and changes in animal behaviour. This can be caused by erosion and compaction, troubling of grazing stock, spreading of invasive species, dog fouling, and tree climbing among other recreational impacts. Typically, disturbance of habitat and species is the unintentional consequence of people's presence which can impact distribution of habitat types and breeding success and survival. Increased development has the potential to increase recreational pressure upon European sites which are accessible to the public.

Ensor's Pool SAC

6.2.2 Ensor's Pool SAC lies within the Ensor's Pool Nature Reserve and is formed in an abandoned clay pit. It is 3.5ha in size with a perimeter of approximately 770m with an average depth of 8m and is fed by groundwater. The site was designated a SAC in 2001 in recognition of its internationally important population of native White-Clawed Crayfish.

6.2.3 As set out in **Section 3.6**, recent surveys of the site have concluded that the once abundant population have disappeared, with cause likely attributed to the spread of 'Crayfish Plague'⁷¹. It was reported to the EA and Natural England in 2005 that one Signal Crayfish (*Paci fastacus leniusculus*), an invasive species from North America, was released into Ensor's Pool. The Signal Crayfish may have been carrying Crayfish plague, however there was no observed mortality until the time of survey. Crayfish plague can also be transferred on fishing and other equipment. Although angling is prohibited on Ensor's Pool, unauthorised fishing does take place.

6.2.4 Whilst there are public footpaths that run through the Nature Reserve, recreational impacts are not identified as a threat / pressure at the SAC within the SIP⁷² or Natural England's supplementary advice, yet recreational impacts have been considered through this AA given the proximity of Ensor's Pool SAC to the Plan area (4km) and the potential for unauthorised angling.

6.3 Mitigation

6.3.1 Policies within the Local Plan including Policy W2: 'Open Space and Sports Provision' require new development to deliver sufficient open space to support growth. Additionally, Policy EN1 (Biodiversity and Geodiversity Protection) and Policy EN4 (Biodiversity Net Gain) secure the creation and protection of naturalistic habitats that function as alternative destinations for walking and nature-based recreation; Policy EN5 (Canopy Cover) and Policy D3 (Landscaping) set out the requirements for new development in the context of well-designed, high-quality green infrastructure; and Policy W1 (Protection of Community Facilities) safeguards existing parks, open spaces and recreational facilities from loss. Collectively, these policies increase the availability, quality, and accessibility of open space across the Plan area.

6.3.2 The Local Plan also sets out provisions for the creation of two new Country Parks in the Plan area. The largest allocation in the Local Plan is for expansion to the west and north of regionally significant Ansty Park on the edge of Coventry, accessed from M6 Junction 2/M69 and the new A46 Walsgrave Junction. This will include the delivery of a 75ha expansion to Coombe Abbey Country Park and a new walking and cycling route to Coventry. In addition, allocation South West Rugby employment phase 2 (Site 17) will include the creation of a wooded 8.6ha publicly accessible country park alongside Cawston Spinnery to include footpaths linking to existing routes and providing east-west connectivity along the northern site boundary. These new Country Parks will increase recreational provision in Rugby for new residents.

⁷¹ David Rogers Associated (2015) White-clawed crayfish survey for Ensor's Pool SSSI/SAC (Warwickshire). Natural England Publication IPENS065. Available at: <https://publications.naturalengland.org.uk/publication/6577286383927296> [Date accessed: 04/12/25].

⁷² Natural England and other parties (2015) White-clawed crayfish survey for Ensor's Pool SSSI/SAC (Warwickshire). Improvement Programme for England's Natura 2000 Sites (IPENS) – Planning for the Future IPENS065. Available at: <https://publications.naturalengland.org.uk/publication/5756899955834880> [Date accessed: 09/12/25]

6.4 Appropriate Assessment

- 6.4.1 Ensor's Pool SAC lies 4km from the Plan area, on the outskirts of Nuneaton, and does not comprise a key recreational destination for residents from Rugby. In addition, Natural England does not identify recreational pressure as a key threat at the SAC⁷³. A review of allocations in the Local Plan found that at its closest point, the closest allocation is located approximately 7.6km from the SAC (Land North of the B4109, Wolvey, site number 309, see **Appendix C, Figure C.1**).
- 6.4.2 A review of available recreational resources in Rugby identified multiple alternative recreational options located within closer proximity to site allocations within the Plan area. This review found that Swift Valley Country Park is located adjacent to the northern edge of Rugby town, between the Eden Park residential area and the Swift Valley employment arena. This country park is managed as a reserve by Warwickshire Wildlife Trust. It comprises 24ha of wetland, grassland and a disused canal with a fully accessible circular walk, benches and significant wildlife features. A total of 22 residential allocations fall within 5km of this Country Park. Newbold Quarry Nature Reserve is located approximately 1.4km to the west of Swift Valley and offers woodland and open water walking trails. Caldecott Park is located approximately 1.4km southeast of Newbold Quarry Nature Reserve and is directly adjacent to residential allocation '353 – Town Hall, Rugby'. A total of 23 residential allocations fall within a 5km radius of Caldecott Park. The variety of facilities provided at Caldecott Park, which include tennis courts, bowling green, children's play areas, bandstand, café, public toilets, lawns and flowerbeds, and its central location are likely to draw local visitors. Whitehall Recreation Ground is located approximately 1km to the southeast of Caldecott Park and offers open green space, children's play area and skate park, making it suitable for children, youth, and casual recreation. Furthermore, the Council maintains a large number of smaller recreation grounds, open spaces, and amenity greens in residential areas; a selection of which are seen on the map displayed in **Figure 6.1**. Collectively, these provide extensive distributed recreational capacity and alternative provision to Ensor's Pool SAC. Alternative recreation sites alongside proposed residential allocations are displayed in **Figure 6.1**.

⁷³ Natural England (2014), Ensor's Pool SAC Site Improvement plan. Available at <https://publications.naturalengland.org.uk/publication/5364843502632960> [Date accessed: 05/12/25].

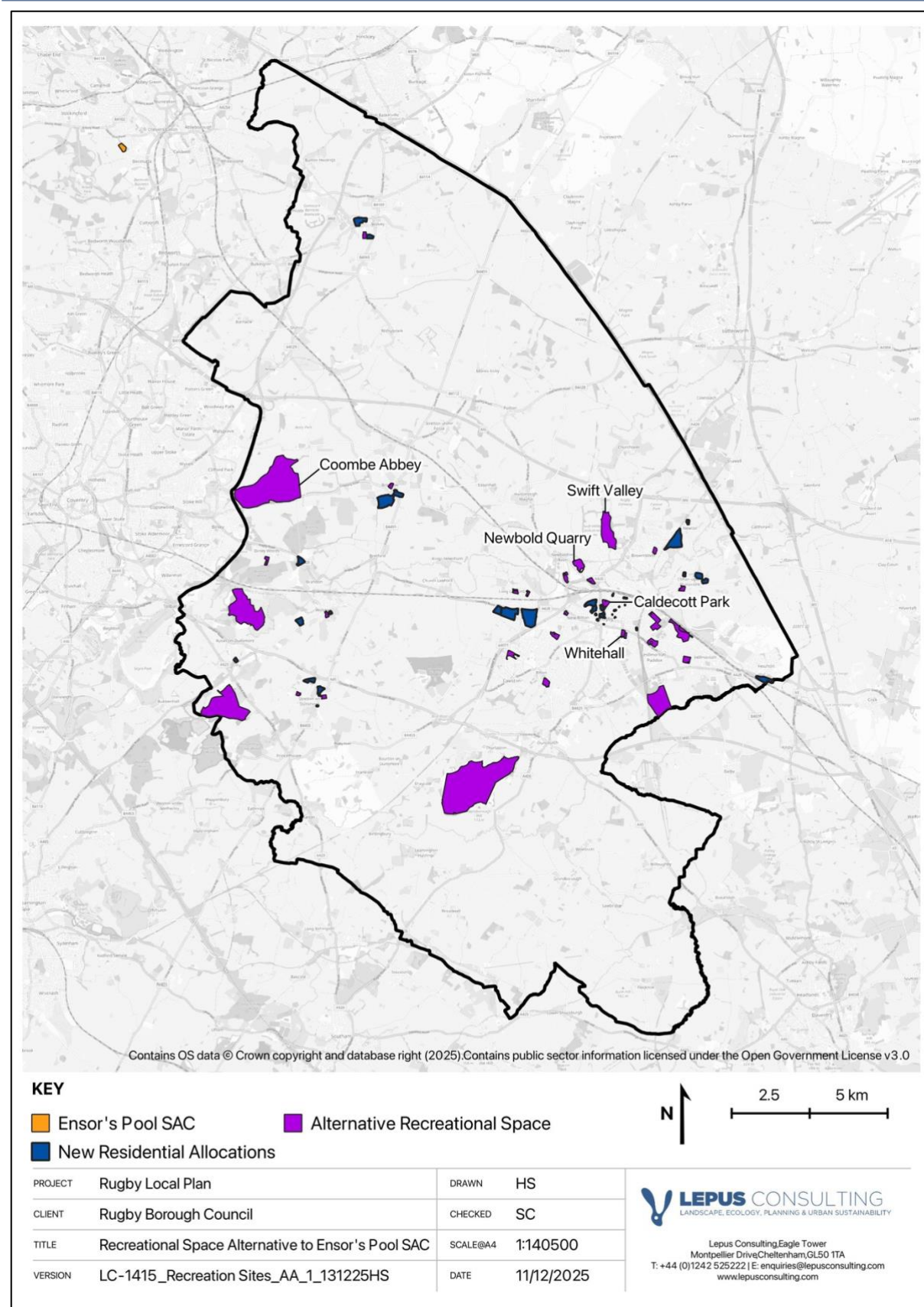


Figure 6.1: Alternative sites to Ensor's Pool SAC for informal recreation

- 6.4.3 Given the distance between the SAC and the nearest residential allocation, the availability of alternative recreational spaces across the Plan area, the lack of recreational pressures identified in the SIP for the SAC and the policies within the Plan designed to ensure open space provision accommodates future growth set out in the Local Plan (including new Country Park provision), it can be concluded that the Local Plan will have no AIOSI from recreational impacts at Ensor's Pool SAC either alone or in-combination.
- 6.4.4 Fishing is strictly prohibited at Ensor's Pool due to the site's conservation status (see **paragraph 3.6.5**). Despite this, community groups and local news sources report occasional instances of unauthorised angling.
- 6.4.5 Angler behaviour studies⁷⁴ and EA surveys⁷⁵ indicate that anglers prefer managed, stocked, legally accessible waters 'closer to home' rather than sites where angling is prohibited or subject to enforcement, and are 'highly supportive' of minimising illegal fishing with penalties and suspensions. Managed fisheries offer known catch potential, maintained access, and club supervision, significantly reducing the likelihood of anglers choosing illegal locations. A review of legal fishing areas within and around the Plan area found multiple managed fisheries and lawful alternatives, including Draycote Reservoir (a permit-run trout and predator fishery), Ryton Pools (angling association waters), club-controlled stretches of the Oxford Canal (permits via Canal & River Trust or local clubs), Makins Fishery (24hr passes) and a number of commercial day-ticket fisheries (Barby Mill Pools, Toft Lakes, Willow Lakes, Meadowlands Fishery, Spring Pools, Home Farm, Old Oak Farm, Hawkesbury Farm and Mineral Lakes). These waters are actively managed with clear permit / membership systems, providing legitimate, high-capacity options in closer proximity to the Plan area than Ensor's Pool (see **Figure 6.2**). These therefore reduce the incentive for illegal fishing at Ensor's Pool, and limit the potential for adverse effects on its qualifying habitats. It can therefore be concluded that the Local Plan will have no AIOSI from illicit recreational impacts at Ensor's Pool SAC either alone or in-combination.

⁷⁴ Ryan, K.L., Syers, C., Holtom, K., Green, T., Lyle, J.M., Stark, K.E. and Tracey, S.R. (2025). Recreational fishers' attitudes to fisheries management and compliance. *Marine Policy*, 172, p.106483. Available at:

<https://www.sciencedirect.com/science/article/pii/S0308597X24004834?via%3Dihub> [Date accessed: 09/12/25]

⁷⁵ Environment Agency (2018), A survey of freshwater angling in England, Phase 2 report: Non-market values associated with angling. Available at

https://assets.publishing.service.gov.uk/media/6176bcfd8fa8f52983494969/A_survey_of_freshwater_angling_in_England_-_phase_2_report.pdf?utm_source=chatgpt.com [Date accessed: 09/12/25].

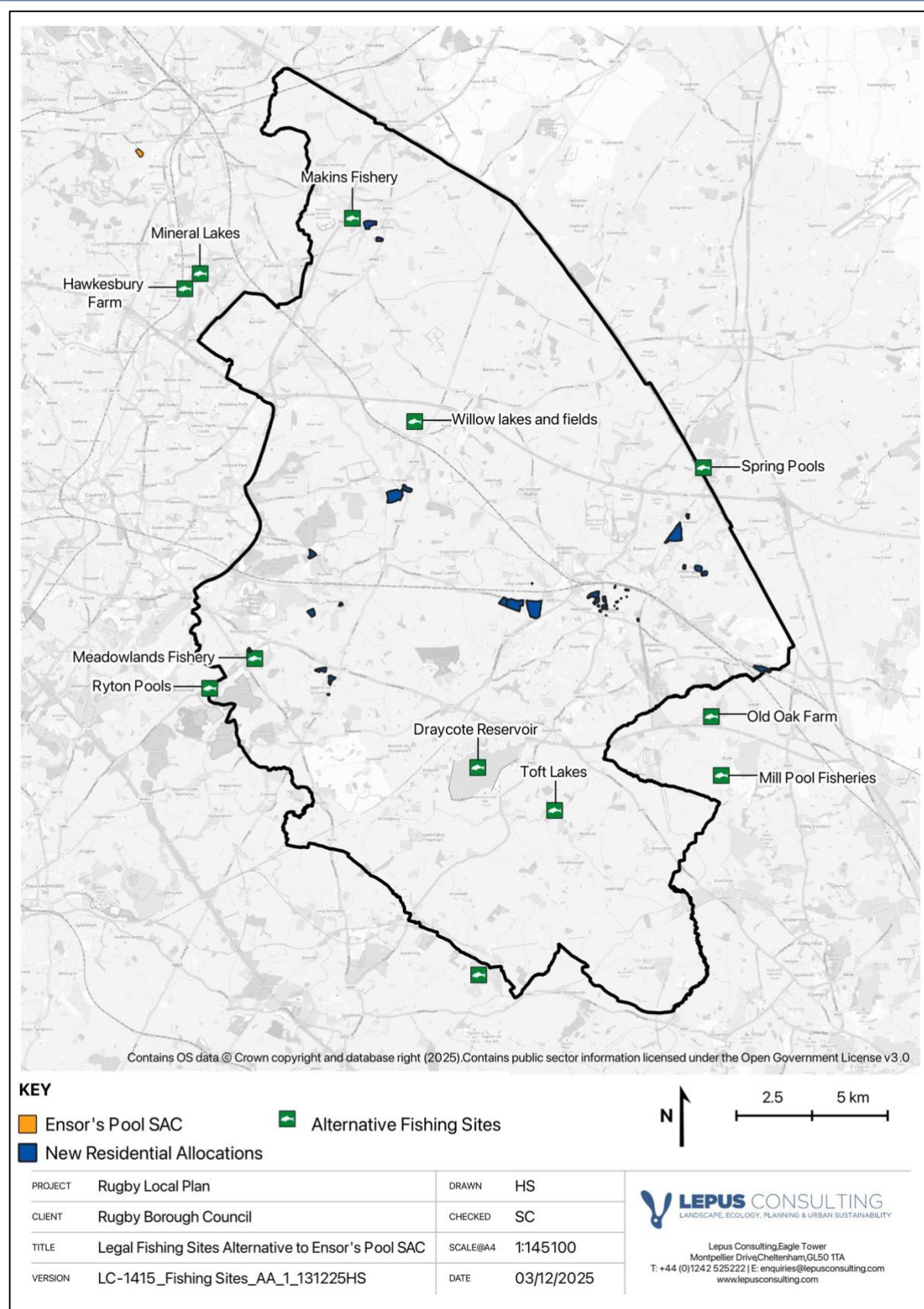


Figure 6.2: Alternative sites to Ensor's Pool SAC for legal angling

6.5 Conclusion

- 6.5.1 Taking into consideration the distance between the SAC and the nearest residential allocation, threats and pressures identified by Natural England at the SAC, the availability of accessible alternative recreational spaces and legal angling sites in and around the Plan area, and the policies within the Plan designed to ensure open space provision accommodates future growth set out in the Local Plan (including new Country Park provision), it can be concluded that the Local Plan will have no AIOSI due to recreational pressures on Ensor's Pool SAC either alone or in-combination.

7 Next Steps

7.1 Summary

7.1.1 The Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment was therefore undertaken which identified a number of LSEs associated with the Local Plan. Taking no account of mitigation measures, the Local Plan has the potential to affect the following European sites:

- Ensor's Pool SAC;
- Humber Estuary SAC;
- Humber Estuary Ramsar;
- Severn Estuary SAC; and
- Severn Estuary Ramsar.

7.1.2 The HRA therefore progressed to the next stage of the HRA process: Appropriate Assessment. The following matters were explored in more detail:

- Impacts on water quality associated with increased levels of built development; and
- Impacts associated with increased recreational pressure, including illicit uses.

7.1.3 A range of potential threats and pressures that might be exacerbated by the Local Plan were identified through the assessment process. The Precautionary Principle has been used in circumstances where likely effects were considered to be uncertain. The protective policies set out in the Local Plan, alongside existing protection measures in existing high level strategic and planning policy frameworks and existing recreational resources within the Plan area have been factored into the assessment process.

7.1.4 Taking into consideration AIOSI at any European site, either alone or in-combination.

7.2 Next steps

7.2.1 The purpose of this report is to inform the HRA of the Local Plan using best available information.

7.2.2 Rugby Borough Council, as the Competent Authority, has responsibility to make the Integrity Test, which can be undertaken in light of the conclusions set out in this report.

7.2.3 This report will be submitted to Natural England, the statutory nature conservation body, for formal consultation. The Council must 'have regard' to Natural England's representations under the provisions of the Habitats Regulations prior to making a final decision as to whether they will 'adopt' the conclusions set out within this report as their own.

Appendix A: In-Combination Assessment

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
Blaby Local Plan ¹	<p>The Local Plan (Core Strategy) was adopted in February 2013. This sits alongside the Local Plan Delivery DPD adopted in February 2019.</p> <p>The Council consulted on the New Local Plan Options (Issues and Options - Regulation 18) between January and March 2021. The Council was aiming to produce the Regulation 19 version of the Local Plan by July 2025; however, this has been extended to April 2026 following the impending completion of a Transport Study.</p>	<p>Housing requirements form part of the New Local Plan options consultation and range from 339 to 632 dwellings per year.</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>
Cherwell Local Plan ²	<p>The Cherwell Local Plan 2015 was adopted July 2015 (updated 2016 and reviewed in 2023).</p> <p>Work on the Local Plan Review 2040 has commenced which will replace the adopted Local Plan 2015 and the 'saved' policies in the Cherwell Local Plan (1996).</p>	<p>This Local Plan review allows for the provision of the required 911 homes per annum from 2020-2042, alongside additional homes, for a total of 24,587 homes.</p> <p>The Plan sets out employment development for 173.12ha, with a net developable area of 97.5ha.</p> <p>A draft HRA4 report was completed in November 2024 which concluded that the Local Plan review would not have an adverse effect on the integrity of</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making</p>

¹ Blaby District Council. New Local Plan. Available at: <https://www.blaby.gov.uk/planning-and-building/local-plan/new-local-plan/> [Date accessed 11/12/2025].

² Cherwell District Council. Planning for Cherwell – Local Plan Review. Available at: <https://www.cherwell.gov.uk/info/83/local-plans/729/planning-for-cherwell---local-plan-review> [Date accessed 11/12/2025].

⁴ Cherwell District Council. DRAFT Report to Inform Habitats Regulations Assessment, Cherwell Local Plan Review 2042 (2024). Available at https://cherwell.citizenspace.com/planning-policy/cherwell-local-plan-review-2042/user_uploads/habitats-regulation-assessment-november-2024.pdf [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
	The Cherwell Local Plan Review 2040 Proposed Submission Document (Regulation 19) ³ underwent consultation from 19 December 2024 – 25 February 2025.	any European sites either alone or in-combination with other plans or projects.	process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.
Coventry Local Plan ⁵	Coventry City Council adopted its Local Plan to 2031 and Area Action Plan in December 2017, which is now under review, with the Emerging Local Plan extending to 2041. The Regulation 19 consultation took place from 20th January to 3rd March 2025. The Local Plan was submitted to the secretary of state on 9th September 2025 for independent examination by the Planning Inspectorate.	The Local Plan sets out the provision of a minimum of 29,100 additional homes and 60ha of employment land. A HRA Regulation 19 Consultation Screening report was conducted in August 2024. The HRA concluded no adverse effects on the integrity of any European sites alone or in-combination as a result of the plan and its proposed development.	Yes. This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.
Harborough Local Plan ⁶	The Council adopted the Local Plan 2011-2031 in 2019.	An HRA ⁷ screening report supported the adoption of the Local Plan 2011-2031. The HRA concluded no	Yes. This plan will trigger change or development close to the Plan area. There

³ Cherwell District Council (December 2024) Cherwell Local Plan Review 2042: Proposed Submission Document (Regulation 19). Available at: <https://www.cherwell.gov.uk/local-plan-review-2042-submission> [Date accessed 24/11/25].

⁵ Coventry City Council. About the Local Plan Review. Available at: <https://www.coventry.gov.uk/planning-policy/local-plan-review> [Date accessed 11/12/2025].

⁶ Harborough District Council. Harborough Local Plan 2011-2031. Available at: https://www.harborough.gov.uk/info/20004/planning_strategy/220/harborough_local_plan_2011-2031 [Date accessed: 11/12/2025].

⁷ Enfusion (August 2024), Coventry City Council, Coventry Local Plan Review 2021 – 2041 Regulation 19 Consultation, Habitats Regulations Assessment (HRA) Screening Report. Available at <https://www.coventry.gov.uk/downloads/file/44127/habitats-regulations-assessment> [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
	An Issues and Options consultation ran from 16 January to 27 February 2019.	adverse effects on European sites either alone or in-combination as a result of the plan.	is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.
Hinckley and Bosworth Local Plan ⁸	<p>The Council is in the process of reviewing and updating the Local Plan. The new Local Plan will set out land allocations and planning policies for the period 2024 – 2045.</p> <p>A Regulation 18 consultation ran from 31 July to 27 September 2024 in light of emerging evidence on the spatial strategy.</p> <p>A new Regulation 18 consultation is in process running from 17th October to 28th November 2025 relating to new and / or updated policies and site allocations.</p>	<p>The consultation draft Local Plan (Regulation 18) sets out the provision of 13,862 dwellings and 194.68ha of employment land during the period 2020-2041.</p> <p>An HRA9 was conducted in support of the Scope, Issues and Options consultation (2018) and the supporting New Directions for Growth Consultation paper (2019). The HRA concluded that there was potential for LSEs at European sites, and an AA was required.</p>	<p>Yes.</p> <p>There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>

⁸ Hinckley and Bosworth Borough Council. Local Plan Review 2020-2041. Available at https://www.hinckley-bosworth.gov.uk/info/200398/Local_plan_review_2024_to_2045 [Date accessed: 11/12/2025].

⁹ JBA Consulting (September 2020) Hinckley & Bosworth Local Plan – Scope, Issues and Options. Shadow Habitat Regulations Assessment Screening Report Draft. Available at https://www.hinckley-bosworth.gov.uk/downloads/file/7104/shadow_habitat_regulations_assessment_screening_report_sept_2020 [Date accessed: 11/12/2025].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
Leicester Local Plan ¹⁰	<p>The Local Plan 2020-2036¹¹ Regulation 19 consultation ran from 16 January 2023 to 27 February 2023.</p> <p>The Main Modifications consultation was completed on 29th July 2025.</p>	<p>The Local Plan sets out a target for the provision of 20,730 dwellings over the Plan period (1,296 dwellings annually). It identifies the following amount of new employment development within the Plan area:</p> <ul style="list-style-type: none"> • 46,000 sqm offices • 67ha for industry and small-scale storage and distribution <p>An HRA12 was conducted in support of the Local Plan. It concluded no adverse impacts on the integrity of European sites alone or in-combination as a result of the Local Plan. Therefore, a full AA is not required.</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>
North Warwickshire Local Plan ¹³	<p>The Local Plan was adopted in September 2021.</p>	<p>The Local Plan sets out the delivery of 9,598 dwellings (479 dwellings per year) to 2033. If the identified number of dwellings are delivered, approximately 100ha of employment land will be required by 2033.</p> <p>An HRA14 was conducted in support of the Local Plan in 2021. It concluded no adverse impacts on</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar and Humber Estuary SAC and</p>

¹⁰ Leicester City Council. Leicester Local Plan – Publication Draft 2020-2036 Consultation (Ref version). Available at: <https://consultations.leicester.gov.uk/sec/9bbe1eaa/> [Date accessed: 10/12/25].

¹¹ Leicester City Council (January 2023) Leicester Local Plan 2020 to 2036. Available at <https://www.leicester.gov.uk/media/xexe0hll/local-plan-r19-doc-11-01-23-1.pdf> [Date accessed 14/11/25].

¹² Leicester City Council (September 2022) Local Plan Habitats Regulations Appropriate Assessment Screening Report. Available at <https://www.leicester.gov.uk/media/yiqe4rl4/habitats-regulation-assessment-hra.pdf> [Date accessed 24/11/25].

¹³ North Warwickshire Borough Council. Local Plan for North Warwickshire. Available at <https://www.northwarks.gov.uk/forward-planning/local-plan-north-warwickshire> [Date accessed 11/12/2025].

¹⁴ LUC (September 2021), North Warwickshire Council, Strategic Environmental Assessment of the North Warwickshire Local Plan (incorporating the Habitats Regulations Assessment) (Adoption Statement 2021). Available at <https://www.northwarks.gov.uk/downloads/file/98/strategic-environmental-assessment-of-the-north-warwickshire-local-plan-adoption-statement-including-hra-2021-> [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
		the integrity of European sites alone or in-combination as a result of the Local Plan.	Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.
Nuneaton and Bedworth Local Plan ¹⁵	The Borough Plan Review (2021-2039) was submitted for examination in February 2024. The Borough Plan Review is scheduled to go to Full Council, with a recommendation for adoption, on 10th December 2025.	The Local Plan sets out the delivery of a minimum of 9,810 homes (545 dwellings per annum), 66.45ha of employment land for local industrial and warehousing development, 2ha of employment land for office space and 19.4ha of land for strategic B8 warehousing and distribution development by 2039. An HRA16 was conducted in support of the Local Plan. It concluded that the Local Plan will not result in adverse effects on the integrity of European sites alone or in-combination.	Yes. This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar and Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.

¹⁵ Nuneaton and Bedworth Borough Council. Borough Plan. Available at <https://www.nuneatonandbedworth.gov.uk/adopted-borough-plan/borough-plan-1> [Date accessed 24/11/25].

¹⁶ AECOM (September 2023) Habitats Regulations Assessment of the Nuneaton and Bedworth Local Plan Review. Available at: <https://www.nuneatonandbedworth.gov.uk/downloads/file/1121/cd8-habitat-regulations-assessment-2023-> [Date accessed: 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
Oadby and Wigston Local Plan ¹⁷	<p>The Council is in the process of preparing a new Local Plan. The Regulation 19 consultation ran from 10 January to 21 February 2025.</p> <p>The Local Plan is now being prepared following consultation responses, prior to its final submission for adoption.</p>	<p>The Local Plan sets out the provision of 6,486 dwellings (382 dwellings per annum) over the Plan period to 2041. The Local Plan does not set out any further employment land, with 5ha of land designated yet to be developed.</p> <p>An HRA18 was conducted in support of the Local Plan. It concluded no adverse impacts on the integrity of any European sites alone or in-combination.</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>
Solihull Local Plan ¹⁹	<p>The Local Plan was adopted by the Council on 3rd December 2013.</p> <p>In May 2021, the Council submitted the Local Plan Review for examination. The council began work on preparing a new Local Plan²⁰ in</p>	<p>The adopted local plan allocates 3,960 net additional homes to ensure sufficient housing land supply to deliver 11,000 additional homes in the period 2006-2028.</p> <p>A stage 1 screening HRA²¹ was developed in 2018 to support the Local Plan review, which concluded</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC</p>

¹⁷ Oadby and Wigston Borough Council. New Oadby and Wigston Local Plan. Available at: https://www.oadby-wigston.gov.uk/pages/new_oadby_and_wigston_local_plan [Date accessed: 24/11/25].

¹⁸ LUC (November 2024) Oadby and Wigston Local Plan: Pre-Submission Draft Habitats Regulations Assessment Report. Available at: https://www.oadby-wigston.gov.uk/files/documents/regulation_19_habitat_regulations_assessment_report_november_2024/Regulation%2019%20Habitat%20Regulations%20Assessment%20Report%20-%20November%202024.pdf [Date accessed 24/11/25].

¹⁹ Solihull Metropolitan Borough Council (2013) Solihull Local Plan – Shaping a Sustainable Future. Available at: <https://www.solihull.gov.uk/Planning-and-building-control/Solihull-local-plan> [Date accessed 24/11/24].

²⁰ Solihull Metropolitan Borough Council (2025) Emerging Local Plan. Available at <https://www.solihull.gov.uk/planning-and-building-control/emerging-local-plan> [Date accessed 24/11/25].

²¹ Middlemarch Environmental (April 2018), Solihull Metropolitan Borough Local Plan Review, Habitats Regulations Assessment Stage 1: Screening. Available at https://www.solihull.gov.uk/sites/default/files/migrated/Planning_LPR_Habitat-Regulations-Assessment-Screening-Report.pdf [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
	<p>November 2024, expected to cover the period 2026 – 2043.</p> <p>A call for sites exercise was undertaken from November 2024 to February 2025.</p> <p>Work is being undertaken to update the evidence base to support the new plan and a draft plan is expected to be published by the end of 2025.</p>	<p>that none of the policies and proposals of the Solihull Local Plan review will result in significant effect on any screened in European sites.</p>	<p>and Ramsar and Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>
Stratford-on-Avon Local Plan ²²	<p>The Core Strategy was adopted by the Council in 2016. In January 2021, the Council commenced a review of its Core Strategy. The review concluded that the Core Strategy remains up-to-date.</p> <p>The Council is undertaking a review and is working with Warwick District Council on the South Warwickshire Local Plan²³. A Preferred Options consultation ran from 10 January to 7 March 2025.</p> <p>The councils continue to prepare the pre-submission draft of the Local Plan.</p>	<p>The South Warwickshire Local Plan sets out the provision of a minimum of 1,679 dwellings per annum with flexibility to accommodate up to 2,188 dwellings per annum until 2050.</p> <p>An HRA²⁴ was conducted in support of the Local Plan. The HRA screens in the Humber Estuary and Severn Estuary SACs and Ramsar sites for AA at Regulation 19.</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar and Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>

²² Stratford-on-Avon District Council. Core Strategy. Available at <https://www.stratford.gov.uk/planning-building/core-strategy.cfm> [Date accessed 24/11/25].

²³ Warwick District Council & Stratford-on-Avon District Council. Available at: <https://www.southwarwickshire.org.uk/swlp/> [Date accessed: 27/01/25].

²⁴ Lepus Consulting (November 2024) Habitats Regulations Assessment of the South Warwickshire Local Plan Regulation 18 Preferred Options. Available at <https://www.southwarwickshire.org.uk/doc/213182/name/LC%201228%20SWLP%20Preferred%20Options%20HRA%203%20201124SC.pdf> [Date accessed: 27/01/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
Tamworth Local Plan ²⁵	<p>The Local Plan 2006-2031 was adopted in February 2016.</p> <p>The Council is currently preparing a new Local Plan 2022-2043. The Council is currently at the evidence gathering stage and has conducted an Issues and Options consultation.</p>	<p>The Local Plan 2006-2031 sets out the provision of a minimum of 4,425 dwellings (177 dwellings per annum) by 2031.</p> <p>An HRA was not available online at the time of writing.</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>
Warwick District Council Local Plan ²⁶	<p>The Local Plan 2011-2029 was adopted in September 2017.</p> <p>Stratford-on-Avon and Warwick District Councils are currently working together to prepare a new local plan for South Warwickshire²⁷. The Councils are currently at the Preferred Options stage. The Preferred Options consultation ran from 10th January to 7th March 2025.</p>	<p>The South Warwickshire Local Plan sets out the provision of a minimum of 1,679 dwellings per annum with flexibility to accommodate up to 2,188 dwellings per annum until 2050.</p> <p>An HRA²⁸ was conducted in support of the Local Plan. The HRA screens in the Humber Estuary and Severn Estuary SACs and Ramsar sites for AA at Regulation 19.</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar and Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be</p>

²⁵ Tamworth Borough Council. Local plans. Available at: <https://www.tamworth.gov.uk/planning/local-plans> [Date accessed 24/11/25].

²⁶ Warwick District Council. Warwick District Local Plan 2011-2029. Available at: https://www.warwickdc.gov.uk/info/20410/local_plan [Date accessed 24/11/25].

²⁷ Warwick District Council & Stratford-on-Avon District Council. Available at: <https://www.southwarwickshire.org.uk/swlp/> [Date accessed 24/11/25].

²⁸ Lepus Consulting (November 2024) Habitats Regulations Assessment of the South Warwickshire Local Plan Regulation 18 Preferred Options. Available at: <https://www.southwarwickshire.org.uk/doc/213182/name/LC%201228%20SWLP%20Preferred%20Options%20HRA%203%20201124SC.pdf> [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
	The councils continue to prepare the pre-submission draft of the Local Plan.		prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.
West Northamptonshire Local Plan ²⁹	<p>The Council is currently preparing a new Local Plan to guide development up to 2041. Consultation on a Regulation 18 Draft Plan ran between April and June 2024.</p> <p>A further consultation on a Regulation 18 Draft Plan will take place in the winter 2025/2026, with the intention to submit the plan for examination by the end of 2026.</p>	<p>The Local Plan sets out the provision of 39,150 new dwellings over the Plan period.</p> <p>An HRA30 was conducted in support of the Local Plan. The screening report concluded potential LSEs at Upper Nene Valley Gravel Pits SPA and Ramsar and required a full AA.</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>
Warwickshire Local Transport Plan ³¹ (LTP4)	Adopted July 2023	LTP4 sets out measures to achieve NetZero including the promotion of active travel and sustainable forms of transport.	The combined impact of LTP4 strategies, in-combination with SWLP growth, on traffic related air quality will be considered further in the HRA process.

²⁹ West Northamptonshire Council. New Local Plan for West Northamptonshire. Available at <https://www.westnorthants.gov.uk/planning-policy/new-local-plan-west-northamptonshire> [Date accessed 24/11/25].

³⁰ Urban Edge Environmental Consulting (April 2024) Habitats Regulations Assessment for the West Northamptonshire Local Plan Screening Report for the Draft Local Plan. Available at: <https://www.westnorthants.gov.uk/planning-policy/new-local-plan-west-northamptonshire> [Date accessed 24/11/25].

³¹ Warwickshire County Council (2023) A New Local Transport Plan for Warwickshire (LTP4) . Available at: <https://www.warwickshire.gov.uk/localtransportplan> [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
Warwickshire Minerals Local Plan ³²	Adopted July 2022	This plan is a Development Plan Document which sets out the spatial strategy, vision, objectives and policies for guiding minerals development in the County until 2032. It was supported by an HRA33 which focused on Ensor's Pool SAC and the River Mease SAC. The HRA was updated in 2021 to incorporate suggested indicative thresholds around Ensor's Pool SAC and the Natural England River Mease Catchment Risk Zone that should be used to trigger a project level HRA for any opportunistic minerals planning applications outside of the seven Preferred Sites. It also considered migratory fish species related to the Humber SAC, SPA and Ramsar site.	Yes. This plan will trigger change or development adjacent to the Plan area. There is potential for in-combination hydrology LSEs.
Warwickshire Waste Core Strategy ³⁴	Adopted July 2013.	The Strategy sets out the Spatial Strategy, Vision, Objectives and Policies for managing waste for a 15-year plan period up to 2028. It also provides the framework for waste development management including implementation and monitoring. It was supported by an HRA35 which concluded no adverse impacts on site integrity.	Yes. This plan will trigger change or development adjacent to the Plan area. There is potential for in-combination air quality, hydrology and functionally linked land LSEs.

³² Warwickshire County Council (2022) Warwickshire Minerals Local Plan 2018 – 2032. Available at: <https://www.warwickshire.gov.uk/mineralslocalplan> [Date accessed 24/11/25].

³³ Warwickshire County Council (2021). Habitats Regulations Assessment. SCREENING DECISION AND APPROPRIATE ASSESSMENT UPDATED, September 2021. <https://www.warwickshire.gov.uk/mineral-waste-plans/minerals-development-framework/> Available at: [Date accessed 24/11/25].

³⁴ Warwickshire County Council (2013) Waste Core Strategy. Adopted Local Plan 2013-2028. Available at: <https://www.warwickshire.gov.uk/mineral-waste-plans/waste-development-framework/1> [Date accessed 24/11/25].

³⁵ Warwickshire County Council, Habitats Regulations Assessment – Screening Report for Minerals and Waste Development Frameworks. Available at <https://api.warwickshire.gov.uk/documents/WCCC-680-147> [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
Severn River Basin Management Plan (RBMP)	The Severn RBMP was updated in October 2022 ³⁶ .	The RBMP provides an overview of river basin planning in England and Wales for the Severn River Basin District. It includes objectives for each water body and a summary of the measures necessary to reach those objectives. The RBMP was supported by an HRA ³⁷ . This concluded that, at the strategic plan level, the RBMP is not likely to have any significant effects on any European sites, alone or in combination with other plans or projects. Given this conclusion, there was no requirement, at this strategic plan level, to progress to the next stage of the HRA (AA). The RBMP does not specify exactly where or how measures should be implemented, this will be determined at either a lower-tier plan or project level and this is taken into consideration in the HRA. The HRA also draws on detailed mitigation measures and procedures currently in place.	Yes. The in-combination impact of development on the achievement of aims in the RBMP will be considered in the HRA process.
Humber River Basin Management Plan (RBMP)	The Humber RBMP was updated in October 2022 ³⁸ .	The RBMP provides an overview of river basin planning in England for the Humber River Basin District. It includes objectives for each water body and a summary of the measures necessary to reach those objectives. The RBMP was supported by an	Yes. The in-combination impact of development on the achievement of aims in the RBMP will be considered in the HRA process.

³⁶ Environment Agency (2022) Severn River Basin Management Plan summary and cross border catchments. Available at : <https://www.gov.uk/government/publications/severn-river-basin-management-plan-summary-and-cross-border-catchments-england-and-wales/severn-river-basin-management-plan-summary-and-cross-border-catchments-england-and-wales> [Date accessed 24/11/25].

³⁷ Environment Agency (2022) River basin management plan for the Severn River Basin District Habitats Regulations Assessment. Available at: https://assets.publishing.service.gov.uk/media/635247738fa8f554c470abf5/Severn_river_basin_management_plan_2022_HRA.pdf [Date accessed 24/11/25].

³⁸ Environment Agency (2022) Humber river basin district management plan: updated 2022. Available at: <https://www.gov.uk/guidance/humber-river-basin-district-river-management-plan-updated-2022> [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
		HRA39. This concluded that, at the strategic plan level, the RBMP is not likely to have any significant effects on any European sites, alone or in combination with other plans or projects. Given this conclusion, there is no requirement, at this strategic plan level, to progress to the next stage of the HRA (AA). The RBMP does not specify exactly where or how measures should be implemented, this will be determined at either a lower-tier plan or project level and this is taken into consideration in the HRA. The HRA also draws on detailed mitigation measures and procedures currently in place.	
Severn Trent Water Resources Management Plan (WRMP) ⁴⁰ .	Severn Trent Water's WRMP was published as the final version on 11th April 2025. The latest plan covers the period between 2025 – 2085.	The draft WRMP describes a likely future supply / demand deficit of 244M/d by plan year 2040-2041 if no action is taken. It sets out the long-term strategy until 2085 to prepare for the future. The Plan proposes ongoing leakage reduction measures, water efficiency and metering activities. Some current EA abstraction licences will be capped to prevent WFD deterioration. It sets out a vision of 'no/low regret' solutions, particularly in response to the challenges of climate change on water demand and supply. The draft builds on previous goals to reduce unsustainable abstraction. Mainly focuses on water availability but considers water quality through design. Severn Trent Water will continue to restore	Yes. The outputs of the WRMP will be taken into consideration in the consideration of in-combination water impacts in the HRA process.

³⁹ Environment Agency (2022) River basin management plan for the Humber River Basin District Habitats Regulations Assessment. Available at: https://assets.publishing.service.gov.uk/media/63524462d3bf7f193d35a0f7/Humber_river_basin_management_plan_2022_HRA.pdf [Date accessed 24/11/25].

⁴⁰ Severn Trent Water (2024) Draft Water Resources Management Plan: Main Narrative. Available at: <https://www.severntrent.com/content/dam/dwrmp24-st/STdWRMP24-Main-Narrative.pdf> [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
		<p>rivers to improve habitats and ecological resilience to low flows.</p> <p>The WRMP was supported by an HRA⁴¹. This concluded that the WRMP is likely to have a significant effect on the following screened in Local Plan European sites within the statutory 25-year planning period either alone (I) or in-combination (L):</p> <ul style="list-style-type: none"> • Cannock Chase SAC • Fens Pools SAC • Humber Estuary SAC and Ramsar • River Mease SAC • Severn Estuary SAC and Ramsar <p>A meaningful AA was not possible at the strategic level for demand-side measures and therefore, the AA is necessarily deferred to the project level. The AA of the supply-side options conclude no adverse impacts on the integrity of any European site through suitable mitigation.</p>	
Severn Trent Water Drought Plan ⁴²	<p>The Severn Trent Drought Plan covers the period 2022 - 2027.</p> <p>Severn Trent is in the process of preparing a statutory five-year Drought Plan from 2024 - 2032, replacing the current plan.</p>	<p>The Drought Plan outlines the operational steps that will be conducted if we face a drought in the next 5 years. It describes how supplies will be enhanced, demands managed, and environmental impacts minimised. It proposes ongoing leakage reduction measures, water efficiency and monitoring and metering activities. An HRA was not available at the time of writing.</p>	<p>Yes.</p> <p>The outputs of the Drought Plan will be taken into consideration as part of the in-combination water impacts in the HRA process.</p>

⁴¹ Severn Trent Water (2022) Habitats Regulations Assessment: Final Water Resources Management Plan 2024. Available at <https://www.severntrent.com/content/dam/wrmp24-documents-and-data-tables-st/final-WRMP24-HRA-Report.pdf> [Date accessed 24/11/25].

⁴² Severn Trent Water (2022) Drought Plan 2022-2027. Available at: <https://www.severntrent.com/content/dam/stw-plc/water-resource-zones/drought-plan-2022-2027.pdf> [Date accessed 24/11/25].

Appendix B: European Site Conservation Objectives and Threats and Pressures

Ensor's Pool SAC¹

Conservation objectives:

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

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

Qualifying features:

S1092. *Austropotamobius pallipes*; White-clawed (or Atlantic stream) Crayfish

Threats and Pressures at European site which may be affected by the Local Plan^{2,3}:

- Air pollution; and,
- Water quality.

Humber Estuary SAC⁴

Conservation objectives:

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

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

Qualifying features:

H1110. Sandbanks which are slightly covered by sea water all of the time; Subtidal sandbanks

H1130. Estuaries

H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats

H1150. Coastal lagoons

¹ Natural England (2018) Ensor's Pool SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/6577286383927296> [Date accessed: 10/12/25].

² Natural England (2014) Ensor's Pool SAC SIP. Available at: <https://publications.naturalengland.org.uk/publication/5364843502632960> [Date accessed: 10/12/25].

³ Natural England (2019) Ensor's Pool SAC Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/publication/6577286383927296> [Date accessed: 10/12/25].

⁴ Natural England (2018) Humber Estuary SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/5009545743040512> [Date accessed: 10/12/25].

Humber Estuary SAC⁴

H1310. *Salicornia* and other annuals colonising mud and sand; Glasswort and other annuals colonising mud and sand

H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritima*)

H2110. Embryonic shifting dunes

H2120. Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram

H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland

H2160. Dunes with *Hippophae rhamnoides*; Dunes with sea-buckthorn

S1095. *Petromyzon marinus*; Sea Lamprey

S1099. *Lampetra fluviatilis*; River Lamprey

S1364. *Halichoerus grypus*; Grey Seal

Threats and Pressures at European site which may be affected by the Local Plan ^{5,6}:

- Water pollution;
- Public access and disturbance;
- Air quality; and,
- Direct land take from development.

Humber Estuary SPA⁷

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

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

Qualifying features:

A021 *Botaurus stellaris*; Great Bittern (Non-breeding)

A021 *Botaurus stellaris*; Great Bittern (Breeding)

A048 *Tadorna tadorna*; Common Shelduck (Non-breeding)

A081 *Circus aeruginosus*; Eurasian Marsh Harrier (Breeding)

A082 *Circus cyaneus*; Hen Harrier (Non-breeding)

A132 *Recurvirostra avosetta*; Pied Avocet (Non-breeding)

A132 *Recurvirostra avosetta*; Pied Avocet (Breeding)

A140 *Pluvialis apricaria*; European Golden Plover (Non-breeding)

A143 *Calidris canutus*; Red Knot (Non-breeding)

⁵ Other threats / pressures identified in the SIP are not considered likely to be influenced by the Local Plan.

⁶ Natural England (2015) Humber Estuary (SAC and SPA) SIP. Available at: <http://publications.naturalengland.org.uk/file/5730884670980096> [Date accessed: 10/12/25].

⁷ Natural England (2019) Humber Estuary SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/5382184353398784> [Date accessed: 10/12/25].

Humber Estuary SPA⁷

A149 *Calidris alpina alpina*; Dunlin (Non-breeding)

A151 *Philomachus pugnax*; Ruff (Non-breeding)

A156 *Limosa limosa islandica*; Black-tailed Godwit (Non-breeding)

A157 *Limosa lapponica*; Bar-tailed Godwit (Non-breeding)

A162 *Tringa totanus*; Common Redshank (Non-breeding)

A195 *Sterna albifrons*; Little Tern (Breeding)

Waterbird assemblage

Threats and Pressures at European site which may be affected by the Local Plan^{8,9}:

- Water pollution;
- Public access and disturbance;
- Air quality; and,
- Direct land take from development.

Humber Estuary Ramsar¹⁰

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
1	<p>The site is a representative example of a near-natural estuary with the following component habitats: dune systems and humid dune slacks, estuarine waters, intertidal mud and sand flats, saltmarshes, and coastal brackish/saline lagoons.</p> <p>It is a large macro-tidal coastal plain estuary with high suspended sediment loads, which feed a dynamic and rapidly changing system of accreting and eroding intertidal and subtidal mudflats, sandflats, saltmarsh and reedbeds. Examples of both strandline, foredune, mobile, semi-fixed dunes, fixed dunes and dune grassland occur on both banks of the estuary and along the coast. The estuary supports a full range of saline conditions from the open coast to the limit of saline intrusion on the tidal rivers of the Ouse and Trent. Wave exposed sandy shores are found in the outer/open coast areas of the estuary. These change to the more moderately exposed sandy shores and then to sheltered muddy shores within the main body of the estuary and up into the tidal rivers. The lower saltmarsh of the Humber is dominated by common cordgrass <i>Spartina anglica</i> and annual Glasswort <i>Salicornia</i> communities. Low to mid marsh communities are mostly represented by Sea Aster (<i>Aster tripolium</i>), Common Saltmarsh Grass (<i>Puccinellia maritima</i>) and Sea Purslane (<i>Atriplex portulacoides</i>) communities. The upper portion of the saltmarsh community is atypical, dominated by Sea Couch (<i>Elytrigia atherica</i>) (<i>Elymus pycnanthus</i>) saltmarsh community. In the upper reaches of the estuary, the tidal marsh community is dominated by the Common Reed (<i>Phragmites australis</i>) fen and Sea Club Rush (<i>Bolboschoenus maritimus</i>) swamp with the Couch Grass (<i>Elytrigia repens</i>) (<i>Elymus repens</i>) saltmarsh</p>

⁸ Other threats / pressures identified in the SIP are not considered likely to be influenced by the Local Plan.

⁹ Natural England (2015) Humber Estuary SIP. Available at: <http://publications.naturalengland.org.uk/file/5730884670980096> [Date accessed: 10/12/25].

¹⁰ JNCC (2007) Ramsar Information Sheet: Humber Estuary. Available at: <https://rsis.ramsar.org/RISapp/files/RISrep/GB663RIS.pdf> [Date accessed: 10/12/25].

Ramsar Criterion	Justification for the application of each criterion
	community. Within the Humber Estuary Ramsar site there are good examples of four of the five physiographic types of saline lagoon.
3	The Humber Estuary Ramsar site supports a breeding colony of Grey Seals (<i>Halichoerus grypus</i>) at Donna Nook. It is the second largest Grey Seal colony in England and the furthest south regular breeding site on the east coast. The dune slacks at Saltfleetby-Theddlethorpe on the southern extremity of the Ramsar site are the most north-easterly breeding site in Great Britain of the Natterjack Toad (<i>Bufo calamita</i>).
5	Assemblages of international importance: 153,934 waterfowl, non-breeding season (5 year peak mean 1996/97-2000/2001)
6	Species/populations occurring at levels of international importance.
Qualifying species/populations (as identified at designation):	
Species with peak counts in winter:	
Common Shelduck, (<i>Tadorna tadorna</i>), NW Europe	4464 individuals, representing an average of 1.5% of the population (5 year peak mean 1996/7-2000/1)
Eurasian Golden Plover, (<i>Pluvialis apricaria altifrons</i>) subspecies, NW Europe, W Continental Europe, NW Africa population	30,709 individuals, representing an average of 3.3% of the GB population (5 year peak mean 1996/7-2000/1)
Red Knot, (<i>Calidris canutus islandica</i>) subspecies	28165 individuals, representing an average of 6.3% of the population (5 year peak mean 1996/7-2000/1)
Dunlin, (<i>Calidris alpina alpina</i>), Europe	22222 individuals, representing an average of 1.7% of the population (5 year peak mean 1996/7-2000/1)
Black-tailed Godwit, (<i>Limosa limosa islandica</i>) subspecies	1,113 individuals, wintering, representing an average of 3.2% of the population (5 year peak mean 1996/7-2000/1)
Bar-tailed Godwit, (<i>Limosa lapponica lapponica</i>) subspecies	2,752 individuals, wintering, representing an average of 2.3% of the population (5 year peak mean 1996/7-2000/1)
Common Redshank, (<i>Tringa totanus totanus</i>)	4632 individuals, representing an average of 3.6% of the population (5 year peak mean 1996/7- 2000/1)
8	The Humber Estuary acts as an important migration route for both River Lamprey (<i>Lampetra fluviatilis</i>) and Sea Lamprey (<i>Petromyzon marinus</i>) between coastal waters and their spawning areas.
Threats and Pressures at European site which may be affected by the Local Plan:	
<ul style="list-style-type: none"> • Water pollution (domestic sewage). • Public access and disturbance. • Air quality. 	

River Mease SAC¹¹

Conservation objectives:

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

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

Qualifying features:

H3260. Water courses of plain to montane levels with the *Ranunculon fluitantis* and *Callitricho-Batrachion* vegetation; Rivers with floating vegetation often dominated by water-crowfoot

S1092. *Austropotamobius pallipes*; White-clawed (or Atlantic stream) crayfish

S1149. *Cobitis taenia*; Spined loach

S1163. *Cottus gobio*; Bullhead

S1355. *Lutra lutra*; Otter

Threats and Pressures at European site which may be affected by the Local Plan ^{12,13}:

- Water pollution; and,
- Water abstraction.

Severn Estuary SPA¹⁴

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

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

Qualifying features:

A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding);

A048 *Tadorna tadorna*; Common shelduck (Non-breeding);

A051 *Anas strepera*; Gadwall (Non-breeding);

A149 *Calidris alpina alpina*; Dunlin (Non-breeding);

A162 *Tringa totanus*; Common redshank (Non-breeding); and

¹¹ Natural England (2018) River Mease SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/6217720043405312> [Date accessed: 10/12/25].

¹² Natural England (2014) River Mease SAC SIP. Available at: <https://publications.naturalengland.org.uk/publication/6640857448972288> [Date accessed: 10/12/25].

¹³ Natural England (2019) River Mease SAC Conservation Objectives Supplementary Advice. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030258.pdf> [Date accessed: 10/12/25].

¹⁴ Natural England (2019) Severn Estuary SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6288530213175296> [Date accessed: 10/12/25].

Severn Estuary SPA¹⁴

A394 *Anser albifrons albifrons*; Greater white-fronted goose (Non-breeding) Waterbird assemblage – see table below.

On the most recent Natura 2000 standard data form¹⁵, the waterfowl assemblage population size was stated as 84,317 whilst the latest Wetland Birds in the UK report¹⁶ cites the figure of 86,836. The most recent form does not include a list of species which make up the waterfowl assemblage for the Severn Estuary SPA. However, the 2001 SPA Review¹⁷ lists 12 additional species (see Table B.1), which are referred to in the HRA report as “SPA Waterfowl Assemblage Species”¹⁸.

Threats and Pressures at European site which may be affected by the Local Plan^{19,20}:

- Public access and disturbance.
- Impacts of development.
- Air pollution.
- Water quality and quantity.
- Noise and visual disturbance.

Table B.1: Severn Estuary SPA Waterfowl Assemblage Species²¹:

English Name	Scientific name
Curlew	<i>Numenius arquata</i>
Grey Plover	<i>Pluvialis squatarola</i>
Lapwing	<i>Vanellus vanellus</i>
Mallard	<i>Anas platyrhynchos</i>
Pintail	<i>Anas acuta</i>
Pochard	<i>Aythya ferina</i>
Shoveler	<i>Anas clypeata</i>
Spotted Redshank	<i>Tringa erythropus</i>
Teal	<i>Anas crecca</i>
Tufted Duck	<i>Aythya fuligula</i>
Whimbrel	<i>Numenius phaeopus</i>
Wigeon	<i>Anas penelope</i>

¹⁵ <http://jncc.defra.gov.uk/pdf/SPA/UK9015022.pdf>

¹⁶ Frost, T.M., Calbrade, N.A., Birtles, G.A., Mellan, H.J., Hall, C., Robinson, A.E., Wotton, S.R., Balmer, D.E. & Austin, G.E. (2020) *Waterbirds in the UK 2018/19: The Wetland Bird Survey*. BTO, RSPB and JNCC, in association with WWT. British Trust for Ornithology, Thetford.

¹⁷ Stroud, D.A., Chambers, D., Cook, S., Buxton, N., Fraser, B., Clement, P., Lewis, P., McLean, I., Baker, H. & Whitehead, S. (eds). (2001) *The UK SPA network: its scope and content*. JNCC. Peterborough.

¹⁸ Palmer, E. and Smart, M. (2021) Identification of wintering and passage roosts on functionally linked land of the Severn Estuary - Gloucestershire and Worcestershire (Phase 5). Natural England Commissioned Reports. NECR401.

¹⁹ Natural England (2015) Severn Estuary (SPA and SAC) SIP. Available at: <http://publications.naturalengland.org.uk/publication/4590676519944192> [Date accessed: 10/12/25].

²⁰ Natural England (2012) Severn Estuary EMS Regulation 33 Conservation Advice Package. Available at: <http://publications.naturalengland.org.uk/publication/3184206> [Date accessed: 10/12/25].

²¹ Stroud, D.A., Chambers, D., Cook, S., Buxton, N., Fraser, B., Clement, P., Lewis, P., McLean, I., Baker, H. & Whitehead, S. (eds). (2001) *The UK SPA network: its scope and content*. JNCC. Peterborough.

Severn Estuary SAC²²

Conservation objectives:

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

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

Qualifying features:

H1110. Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks;

H1130. Estuaries;

H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats;

H1170. Reefs;

H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritima*); Atlantic salt meadows;

S1095. *Petromyzon marinus*; Sea lamprey;

S1099. *Lampetra fluviatilis*; River lamprey; and

S1103. *Alosa fallax*; Twaite shad.

Threats and Pressures at European site which may be affected by the Local Plan^{23,24}:

- Public access and disturbance;
- Impacts of development;
- Air pollution;
- Water quality and quantity; and,
- Noise and visual disturbance.

²² Natural England (2019) Severn Estuary SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6377265718099968> [Date accessed: 10/12/25].

²³ Natural England (2015) Severn Estuary (SPA and SAC) SIP. Available at: <http://publications.naturalengland.org.uk/publication/4590676519944192> [Date accessed: 10/12/25].

²⁴ Natural England (2012) Severn Estuary EMS Regulation 33 Conservation Advice Package. Available at: <http://publications.naturalengland.org.uk/publication/3184206> [Date accessed: 10/12/25].

Severn Estuary Ramsar²⁵

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
1	Due to immense tidal range (second-largest in world), this affects both the physical environment and biological communities.
3	Due to unusual estuarine communities, reduced diversity and high productivity.
4	<p>This site is important for the run of migratory fish between sea and river via estuary. Species include:</p> <ul style="list-style-type: none"> • Salmon (<i>Salmo salar</i>); • Sea Trout (<i>S. trutta</i>); • Sea Lamprey (<i>Petromyzon marinus</i>); • River Lamprey (<i>Lampetra fluviatilis</i>); • Allis Shad (<i>Alosa alosa</i>); • Twaite Shad (<i>A. fallax</i>), and • Eel (<i>Anguilla Anguilla</i>). <p>It is also of particular importance for migratory birds during spring and autumn.</p>
5	<p>Assemblages of international importance:</p> <p>Species with peak counts in winter:</p> <p>70919 waterfowl (5 year peak mean 1998/99-2002/2003)</p>
6	Species/populations occurring at levels of international importance.
Qualifying species/populations (as identified at designation):	
Species with peak counts in winter:	
Tundra Swan, (<i>Cygnus columbianus bewickii</i>), NW Europe	229 individuals, representing an average of 2.8% of the GB population (5 year peak mean 1998/9-2002/3)
Greater White-Fronted Goose, (<i>Anser albifrons albifrons</i>), NW Europe	2076 individuals, representing an average of 35.8% of the GB population (5 year peak mean for 1996/7-2000/01)
Common Shelduck, (<i>Tadorna tadorna</i>), NW Europe	3223 individuals, representing an average of 1% of the population (5 year peak mean 1998/9-2002/3)
Gadwall, (<i>Anas strepera strepera</i>), NW Europe	241 individuals, representing an average of 1.4% of the GB population (5 year peak mean 1998/9-2002/3)
Dunlin, (<i>Calidris alpina alpina</i>), W Siberia/W Europe	25082 individuals, representing an average of 1.8% of the population (5 year peak mean 1998/9-2002/3)

²⁵ JNCC (2008) Ramsar Information Sheet: UK11081 Severn Estuary. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11081.pdf> [Date accessed: 10/12/25].

Common Redshank, (<i>Tringa totanus totanus</i>)	2616 individuals, representing an average of 1% of the population (5 year peak mean 1998/9- 2002/3)
Species/populations identified subsequent to designation for possible future consideration under criterion 6.	
Species regularly supported during the breeding season:	
Lesser Black-Backed Gull, (<i>Larus fuscus graellsii</i>), W Europe/Mediterranean/W Africa	4167 apparently occupied nests, representing an average of 2.8% of the breeding population (Seabird 2000 Census)
Species with peak counts in spring/autumn:	
Ringed Plover, (<i>Charadrius hiaticula</i>), Europe/Northwest Africa	740 individuals, representing an average of 1% of the population (5 year peak mean 1998/9- 2002/3)
Species with peak counts in winter:	
Eurasian Teal, (<i>Anas crecca</i>), NW Europe	4456 individuals, representing an average of 1.1% of the population (5 year peak mean 1998/9-2002/3)
Northern Pintail, (<i>Anas acuta</i>), NW Europe	756 individuals, representing an average of 1.2% of the population (5 year peak mean 1998/9- 2002/3)
8	<p>The fish of the whole estuarine and river system is one of the most diverse in Britain, with over 110 species recorded.</p> <p>Salmon (<i>Salmo salar</i>), Sea Trout (<i>S. trutta</i>), Sea Lamprey (<i>Petromyzon marinus</i>), River Lamprey (<i>Lampetra fluviatilis</i>), Allis Shad (<i>Alosa alosa</i>), Twaite Shad (<i>A. fallax</i>), and Eel (<i>Anguilla Anguilla</i>) use the Severn Estuary as a key migration route to their spawning grounds in the many tributaries that flow into the estuary.</p> <p>The site is important as a feeding and nursery ground for many fish species particularly Allis Shad (<i>Alosa alosa</i>) and Twaite Shad (<i>A. fallax</i>) which feed on mysid shrimps in the salt wedge.</p> <p>Threats and Pressures at European site which may be affected by the Local Plan²⁶:</p> <ul style="list-style-type: none"> • Public access and disturbance; • Impacts of development; • Air pollution; • Water quality and quantity; and, • Noise and visual disturbance.

²⁶ Natural England (2012) Severn Estuary EMS Regulation 33 Conservation Advice Package. Available at: <http://publications.naturalengland.org.uk/publication/3184206> [Date accessed: 10/12/25].

Appendix C: Screening evaluation of Proposed Submission Draft Local Plan

The Rugby Borough Local Plan policies and allocations have been screened using the DTA HRA pre-screening categories¹ presented in **Table C.1**.

Table C.1: Assessment and reasoning categories from Part F of the DTA Handbook

Screening evaluation and reasoning categories from Chapter F of the Habitats Regulations Assessment Handbook (DTA Publications, 2013)	Screen in / out
A. General statements of policy / general aspirations.	Screen Out
B. Policies listing general criteria for testing the acceptability / sustainability of proposals.	Screen Out
C. Proposal referred to but not proposed by the Plan.	Screen Out
D. General plan-wide environmental protection / designated site safeguarding / threshold policies.	Screen Out
E. Policies or proposals that steer change in such a way as to protect European sites from adverse effects.	Screen Out
F. Policies or proposals that cannot lead to development or other change.	Screen Out
G. Policies or proposals that could not have any conceivable or adverse effect on a site.	Screen Out
H. Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in-combination with other aspects of this or other plans or projects).	Screen Out
I. Policies or proposals with a Likely Significant Effect on a site alone.	Screen In
J. Policies or proposals unlikely to have a significant effect alone.	Screen Out
K. Policies or proposals unlikely to have a significant effect either alone or in-combination.	Screen Out
L. Policies or proposals which might be likely to have a significant effect in-combination.	Screen In
M. Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European site.	Screen In

¹ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook edition UK: DTA Publications Limited. Available at: www.dtapublications.co.uk [Date accessed: 10/12/25]

The following section of **Appendix C** provides a screening evaluation of policies which comprise the Proposed Submission Draft Local Plan.

Chapter 1: Strategy

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
S1	Settlement Hierarchy	This policy sets out that new development will be of a scale commensurate with the services and facilities of the settlement and local context (i.e. Rugby urban area, main rural settlements and other rural settlements). Rugby urban areas will be the main focus for new homes and employment. It will not trigger development and will therefore not have an LSE on any European site either alone or in-combination.	Category F	Screen Out
S2	Strategy for homes	This policy sets out the delivery of 10,812 new homes over the Plan period (2025-2042) (636 dwellings per year). It outlines the locations of this provision, totalling 11,729 residential dwellings. New residential development cumulatively across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSE at a number of European sites.	Category L	Screen In
S3	Strategy for employment land	This policy sets out the delivery of approx. 1.4ha of office floorspace and 299ha of B2 and B8 buildings over the Plan period. It outlines the locations of this provision, totalling approx. 1,084,900sq m. New employment development cumulatively across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSEs at a number of European sites.	Category L	Screen In
S4	Sites for Gypsies and Travellers	This policy sets out the provision of Gypsy and Traveller sites for 68 pitches (new allocations accounting for 58 pitches). It sets out the requirements of planning applications for pitches on non-allocated sites and safeguards existing and new permanent Gypsy and Traveller sites for Gypsy and Traveller use. New Gypsy and Traveller provision cumulatively across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSEs at a number of European sites. These allocations are illustrated on Figure C.1 .	Category L	Screen In
S5	Countryside protection	This policy sets out the requirements of new development outside the allocations and outlines the application of national Green Belt policy within the borough. It outlines a plan-wide protection policy and will therefore not have an LSE on any European site either alone or in-combination.	Category F	Screen Out
S6	Residential allocations	This policy outlines the number of dwellings for each residential allocation and the principles for their development. New residential development cumulatively	Category L	Screen In

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
		across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSEs at a number of European sites. These allocations are illustrated on Figure C.2 .		
S7	Employment allocations	This policy outlines the approximate floorspace for each employment allocation and the principles for their development, totalling 865,000sq m. New employment development cumulatively across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSEs at a number of European sites. These allocations are illustrated on Figure C.3 .	Category L	Screen In
S8	South West Rugby	This policy outlines the delivery of South West Rugby, a new neighbourhood of approx. 4,000 dwellings together with employment land. It sets out the provision of infrastructure at the site and the principles for development, including the physical and visual separation from Dunchurch through a green buffer. Development of the site cumulatively across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSEs at a number of European sites.	Category L	Screen In
S9	South West Rugby spine road network	This policy outlines the delivery of a spine road network and will not permit development which prejudice its delivery. Infrastructure development of the site cumulatively across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSEs at a number of European sites.	Category L	Screen In

Chapter 2: Climate

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
CL1	Net zero buildings	This policy sets out requirements in terms of net zero in new buildings. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
CL2	Renewable energy and low carbon technology	This policy permits renewable energy and low energy development proposals subject to meeting the policy requirements. It sets out the requirements of permitting Green Belt proposals. It will not have an LSE on any European site either alone or in-combination.	Category F	Screen Out
CL3	Water supply, quality and efficiency	This policy sets out requirements in terms of water supply, water quality and water efficiency for new development. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
CL4	Climate adaptation	This policy requires all development to be resilient to and adapt to the future impacts of climate change, including urban cooling, reducing air conditioning and managing flood risk. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

Chapter 3: Economy

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
E1	Employment land protection	This policy protects employment land designated within the Local Plan. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
E2	Employment development	This policy outlines the requirements of development of employment sites outside of employment allocations. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
E3	Rural economy	This policy outlines the types of development acceptable in and outside of rural settlement boundaries, subject to requirements. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

Chapter 4: Centres

Policy number	Policy name	Justification: Activities that may result in a LSE on a European site	Screening category	HRA screening
C1	Rugby town centre	This policy outlines the development up to 2042 in Rugby town centre, including the redevelopment of Rugby Central Shopping Centre, a new mixed-use hub and a new apartment living quarter. It sets out the placemaking principles of development in the town centre. Development of Rugby town centre cumulatively across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSEs at a number of European sites.	Category L	Screen In
C2	Main town centre uses	This policy sets out the requirements of development within main town centres. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
C3	Local and district centres	This policy sets out the requirements of development within local and district centres. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
C4	Neighbourhood hubs	This policy supports Use Classes E, F.1, F.2 and other community facilities at ground floor units. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

Chapter 5: Environment

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
EN1	Biodiversity and geodiversity protection	The policy sets out the application of national policy and legislation for developments with the potential to harm biodiversity. It outlines that development likely to result in the harm to or loss of Local Wildlife Site, Local Nature Reserve or Local Geological Site will not be permitted, subject to requirements. It outlines a plan-wide environmental protection policy and will therefore not have an LSE on any European site either alone or in-combination.	Category D	Screen Out
EN2	Landscape protection	This policy sets out that development will avoid adverse impacts on landscape and requires development to be sensitively located and designed. It outlines a plan-wide landscape protection policy and will therefore not have an LSE on any European site either alone or in-combination.	Category D	Screen Out
EN3	Areas of High Landscape Value	This policy requires development located within the Ironstone Fringe and Rainsbrook Valley slopes Areas of High Landscape Value to protect and enhance the landscape. It outlines a plan-wide landscape protection policy and will therefore not have an LSE on any European site either alone or in-combination.	Category D	Screen Out
EN4	Biodiversity net gain	This policy sets out accordance with the requirements Biodiversity Net Gain under the Environment Act 2021. It outlines a plan-wide environmental protection policy and will therefore not have an LSE on any European site either alone or in-combination.	Category D	Screen Out
EN5	Canopy cover	This policy requires all major development outside of Rugby town centre to increase post-development canopy cover to at least 20% of the site area. It outlines a plan-wide environmental policy and will therefore not have an LSE on any European site either alone or in-combination.	Category D	Screen Out
EN6	Flood risk	This policy outlines the requirements to permit development within an area of flood risk. It safeguards the functional floodplain, areas for flood risk management and areas within 8m from the edge of a watercourse from built development. It outlines a plan-wide policy and will therefore not have an LSE on any European site either alone or in-combination.	Category D	Screen Out

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
EN7	Environmental protection and amenity	This policy protects human health and wellbeing and amenity from development. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category D	Screen Out
EN8	Air Quality	This policy outlines the air quality standards for development of more than 1,000sq m or 10 or more dwellings, and measures to offset any shortfall. It will not trigger any development or change which may have an LSE on any European site either alone or in-combination.	Category D	Screen Out

Chapter 6: Housing

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
H1	Housing mix	This policy sets out the contribution to meeting the housing needs of the borough including a mix of housing tenure, types and sizes to support the creation of mixed, balanced and inclusive communities. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
H2	Affordable housing	This policy sets out the provision of affordable homes within the borough. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
H3	Rural worker dwellings	This policy sets out the requirements of a permanent dwelling for occupation by a person engaged in agricultural or land-based rural business. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
H4	Rural exception sites	This policy sets out the requirements of rural exception sites. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
H5	Replacement dwellings	This policy sets out the requirements of replacement dwellings. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
H6	Specialist housing	This policy sets out the requirements of specialist housing. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
H7	Housing standards	This policy sets out the requirements of new dwellings to meet the Nationally Described Space Standards. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
H8	Housing in multiple occupation	This policy sets out the requirements of houses in multiple occupation (HMOs). It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

Chapter 8: Wellbeing

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
W1	Protection of community facilities	This policy protects community facilities and outlines exceptions. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
W2	Open space and sports provision	This policy sets out the open space standards for residential developments of 10 or more dwellings. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

Chapter 9: Design

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
D1	Well-designed places	This policy requires development to create or contribute to well-designed places, setting a set of criteria for development. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category B	Screen Out
D2	Infill and householder development	This sets out the requirements of infill and householder development including extensions and alterations to existing dwellings. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
D3	Landscaping	This policy outlines the requirements of development in terms of landscaping. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
D4	Historic environment	This policy supports development that sustains and enhances the borough's heritage assets. It sets out the requirements of developments with the potential to affect the significance of a heritage asset. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
D5	Sustainable drainage	This policy sets out the management of surface water run-off through Sustainable Drainage Systems (SuDs) and sets out the requirements of these SuDs. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

Chapter 10: Infrastructure

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
11	Transport	This policy sets out the provision of transport in line with the transport user hierarchy outlined in the Warwickshire Local Transport Plan and prioritises active travel including cycling and walking infrastructure provision. It sets out the requirements of transport development. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
12	Parking	This policy sets out the provision of adequate parking for bicycles and vehicles in accordance with parking standards, including meeting the needs of people with disabilities or impaired mobility. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
13	Communications Infrastructure	This policy sets out the provision of communications infrastructure including full fibre broadband connections. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
14	Infrastructure and planning obligations	This policy sets out the provision of infrastructure in line with development. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
15	New railway stations	This policy safeguards land to support the delivery of the proposed Nuneaton Parkway and Rugby Parkway railway stations. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

The Proposed Submission Draft Regulation 19 Local Plan sets out the following residential and employment allocations (see **Figures C.1 to C.3**).

Local Plan Site ID	Site Name	Residential or employment development?	Approximate residential dwellings / employment floorspace
54	Oakdale Nursery, Binley Woods	Residential	43 dwellings
337	West Farm and Home Farm, Brinklow	Residential	75 dwellings
315	Land south of Rugby Road, Brinklow	Residential	250 dwellings
129	Land North of Lilbourne Road, Clifton upon Dunsmore	Residential	60 dwellings
202	Newton Road, Clifton upon Dunsmore	Residential	80 dwellings
307	North Road, Clifton upon Dunsmore	Residential	10 dwellings
316	Land at Long Lawford	Residential	400 dwellings
253	Lawford Fields Farm	Residential	250 dwellings
172	Elizabeth Way, Long Lawford	Residential	5 dwellings
87	Hillcrest Farm, Newton	Residential	25 dwellings
62	Morgan Sindall House, Rugby town centre	Residential	90 dwellings
332	Former Rugby Borough Council depot, Albert Street, Rugby	Residential	25 dwellings
353	Town Hall, Rugby	Residential	124 dwellings
283	Rugby Central Shopping Centre	Residential	200 dwellings
350	Rounds Gardens, Rugby	Residential	70 dwellings
351	North of Rounds Gardens, Rugby	Residential	60 dwellings
354	92 Lower Hillmorton Road, Rugby	Residential	34 dwellings
279	Former Stagecoach car park, Railway Terrace, Rugby	Residential	32 dwellings

Local Plan Site ID	Site Name	Residential or employment development?	Approximate residential dwellings / employment floorspace
153	Westway Car Park, Rugby	Residential	24 dwellings
294	Land adjacent to 9 Railway Terrace, Rugby	Residential	14 dwellings
356	The Railings (NHS) off Woodside Park, Rugby	Residential	105 dwellings
357	28-29 High Street, Rugby	Residential	8 dwellings
352	Former Snooker Hall, Railway Terrace, Rugby	Residential	7 dwellings
349	Land to the rear of Albert Street, Rugby	Residential	5 dwellings
355	Land adjacent to 44 Craven Road, Rugby	Residential	5 dwellings
59	Newton Manor Lane, Brownsover	Residential	285 dwellings
338	Land south of Crick Road, Houlton	Residential	250 dwellings
100	Land at High Street, Ryton-on-Dunsmore	Residential	37 dwellings
6	Land east of Fosse Way opposite Knob Hill, Stretton-on-Dunsmore	Residential	3 dwellings
81	Land West of Fosse Way, Stretton-on-Dunsmore	Residential	40 dwellings
348	The Croft, School Lane, Stretton-on-Dunsmore	Residential	70 dwellings
39	Dyers Lane, Wolston	Residential	15 dwellings
136	Land North of Warwick Road, Wolston	Residential	80 dwellings
358	Land at Coventry Road, Wolvey	Residential	60 dwellings
309	Land north of B4109, Wolvey	Residential	150 dwellings
64	Coton Park east, Rugby	Employment	115,000m ²
17	South West Rugby employment phase 2	Employment	130,000m ²
14	North of Ansty Park	Employment	75,000m ²

Local Plan Site ID	Site Name	Residential or employment development?	Approximate residential dwellings / employment floorspace
95	Crowner Fields Farm and Home Farm, Hinckley Road, Ansty	Employment	275,000m ²
121	Land at Walsgrave Hill	Employment	290,000m ²

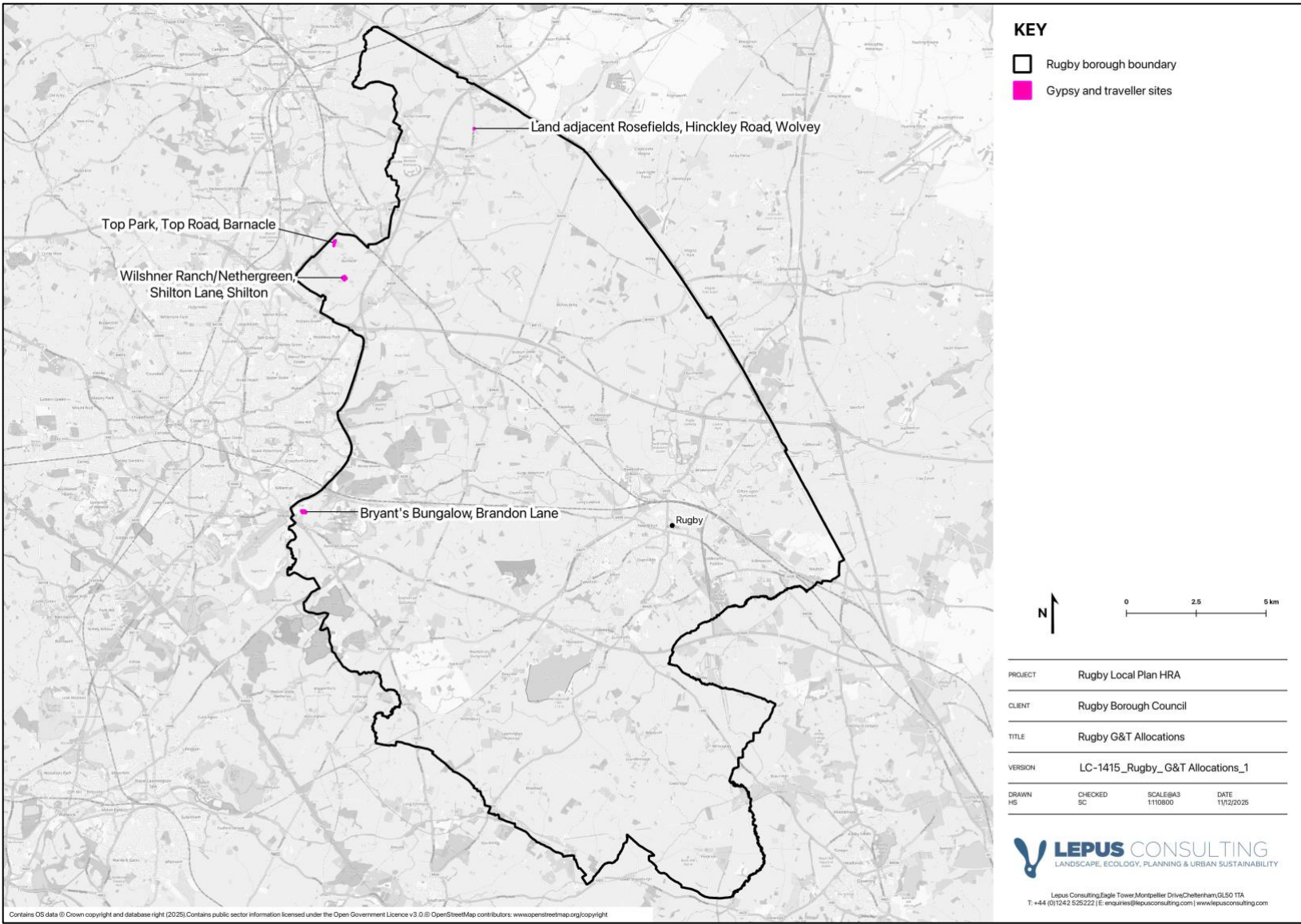


Figure C.1: Rugby Gypsy and Traveller site allocations

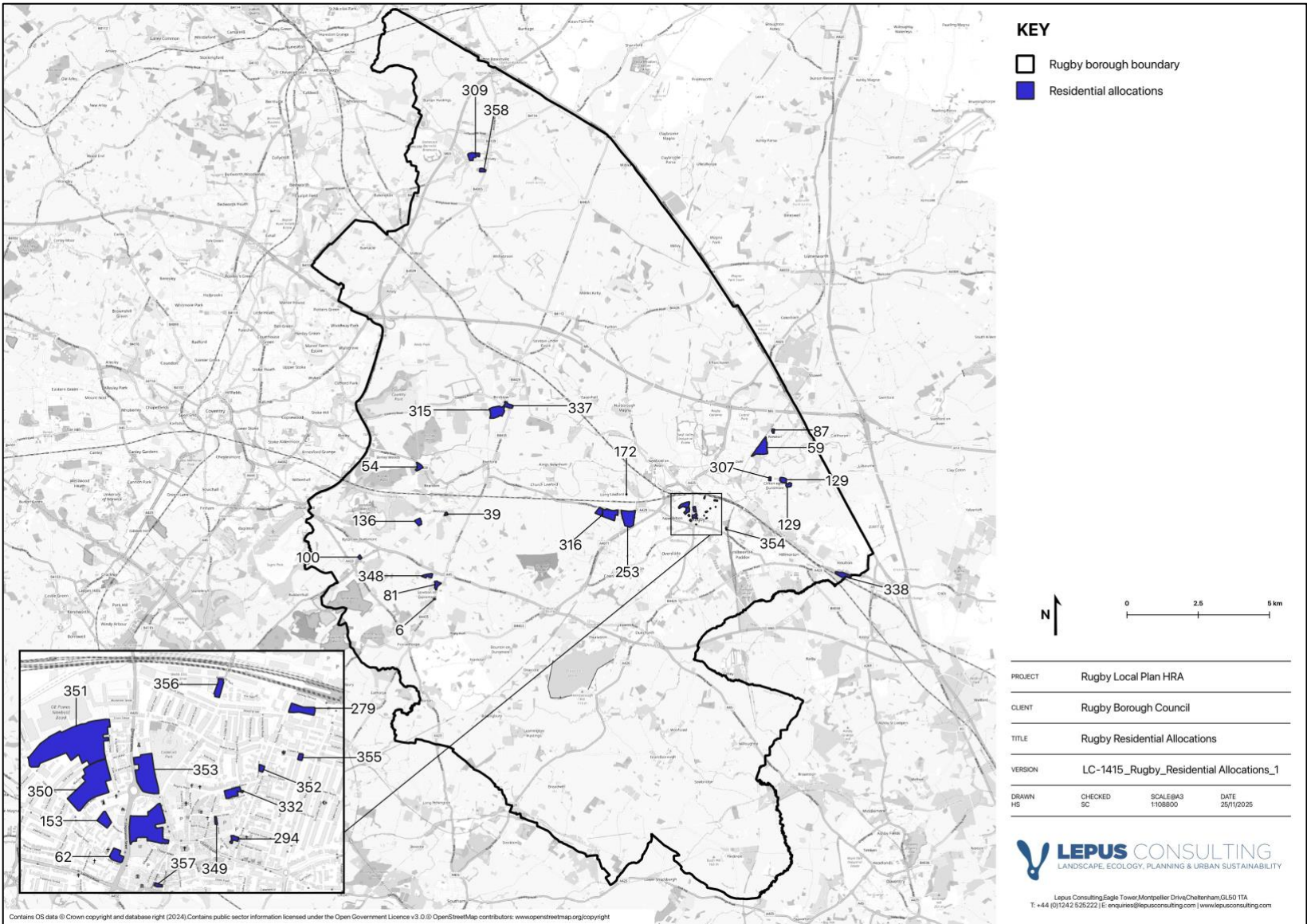


Figure C.2: Rugby residential allocations

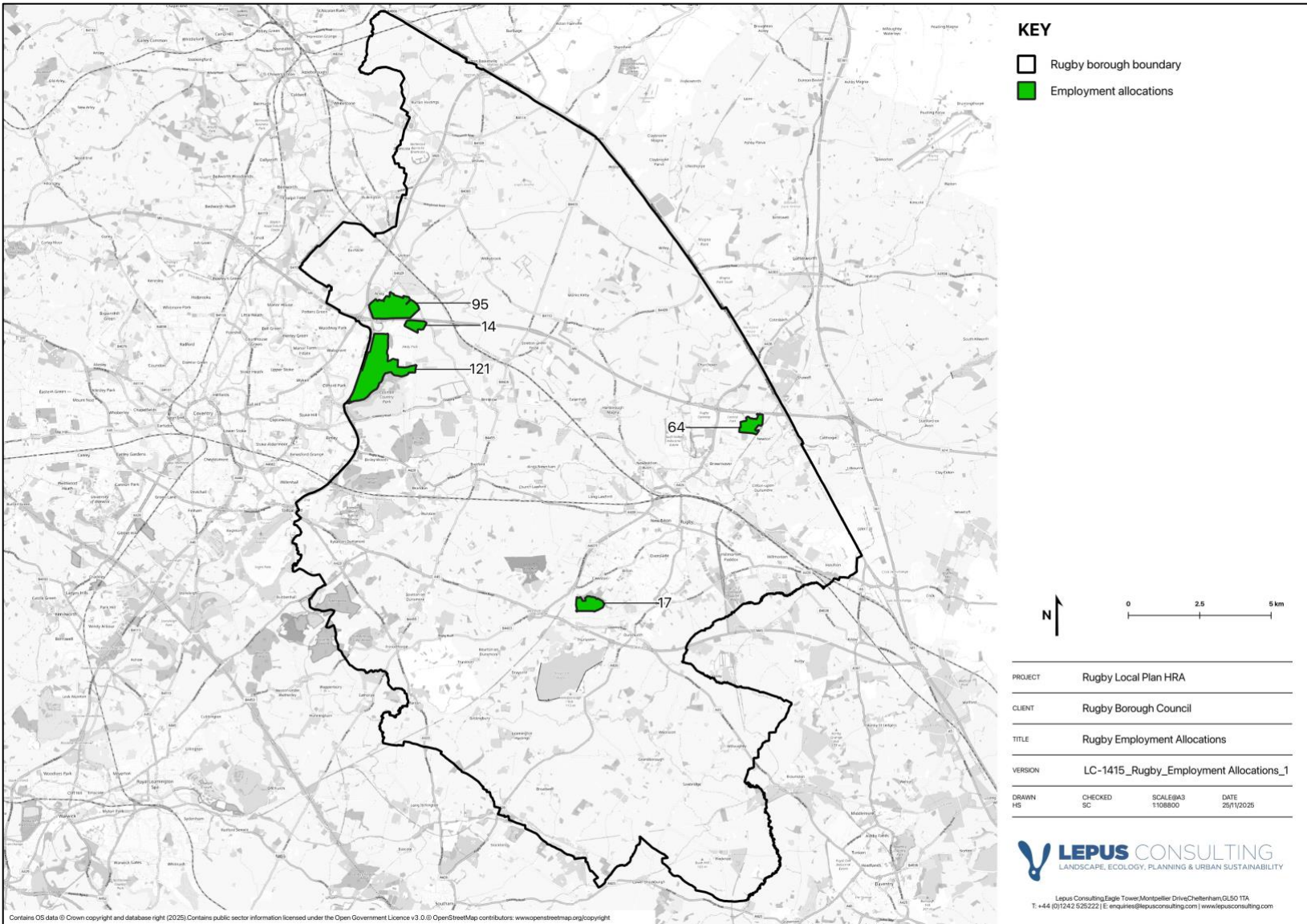


Figure C.3: Rugby employment allocations

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Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys

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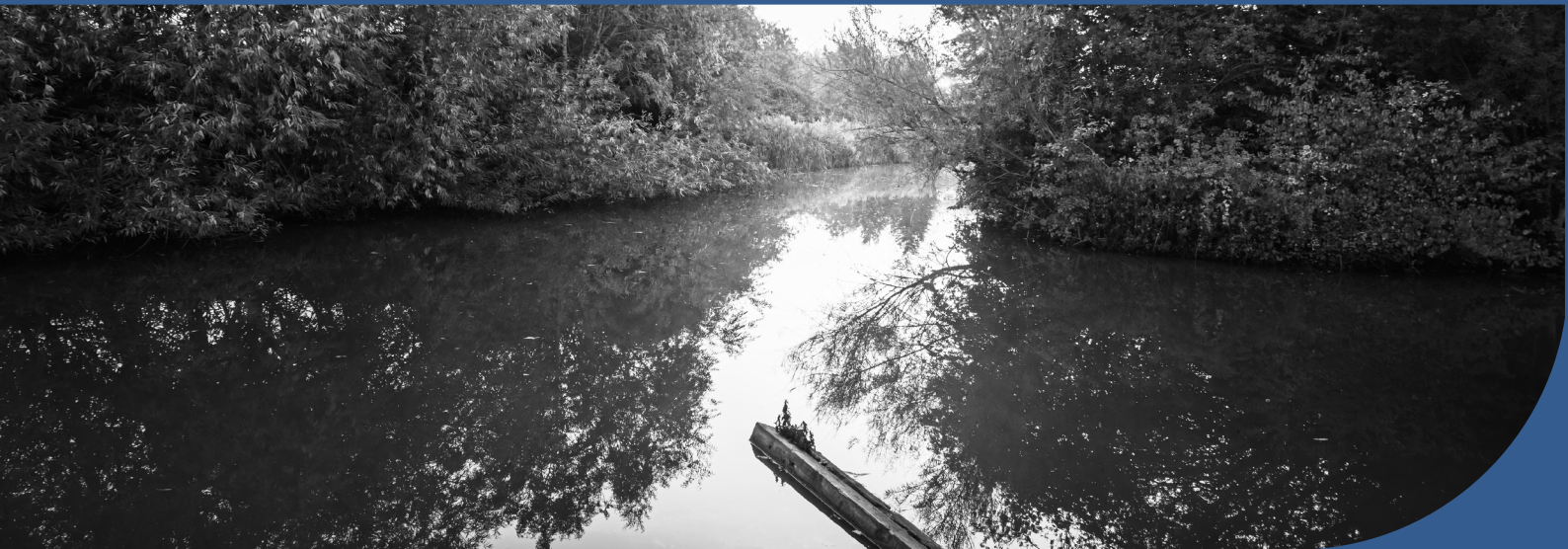
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