

Habitats Regulations Assessment of the Rugby Local Plan

Regulation 18: Preferred Options

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LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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Acronyms & Abbreviations

AA	Appropriate Assessment
AADT	Annual Average Daily Traffic
ALS	Abstraction License Strategy
APIS	Air Pollution Information System
CAMS	Catchment Abstraction Strategy
CIEEM	Chartered Institute of Ecology and Environmental Management
DTA	David Tyldesley and Associates
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
LPA	Local Planning Authority
LSE	Likely Significant Effect
NE	Natural England
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
ppSPA	Possible Potential Special Protection Area
PRoW	Public Right of Way
RBMP	River Basin Management Plan
SAC	Special Area of Conservation
SIP	Site Improvement Plan
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
SWMP	Surface Water Management Plan
SWMC	Surface Water Management Catchment
UK	United Kingdom
WCS	Water Cycle Study
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 Preferred Options version of the Rugby Local Plan at Regulation 18.
- E2. HRA is undertaken in a number of stages. The first stage of the process is the screening stage (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) which has been undertaken alongside preparation of the Rugby Local Plan.
- 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 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 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.
- E6. It is therefore concluded that the Rugby Local Plan will be screened into the HRA process. The next stage of the HRA process will be Stage 2, Appropriate Assessment.
- E7. It is too early at this stage of the plan making process to undertake a full Appropriate Assessment as key pieces of evidence are in preparation, and these will inform the details within the Local Plan.
- E8. Water quality modelling will be undertaken as part of a Stage 2 Water Cycle Study (WCS) to inform the plan making process. Outputs from this modelling will inform a consideration of in-combination water quality impacts at functionally linked watercourses associated with

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/ukksi/2017/1012/contents> [Accessed: 14/12/22] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Accessed: 12/07/24].

the Severn Estuary and Humber Estuary designations through an Appropriate Assessment at Regulation 19. In addition, a review will be undertaken in terms of accessibility from each allocation to Ensor's Pool and alternative recreational spaces provided in the Plan area.

1 Introduction

1.1 Background

1.1.1 Rugby Borough Council (RBC) is currently in the process of reviewing the current Local Plan 2011-2031, adopted in June 2019². A Regulation 18 Issues and Options consultation was carried out between October 2023 and February 2024.

1.1.2 The Local Plan will 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**.

1.1.3 Once adopted, the Local Plan will form part of the statutory development plan for the borough covering the period to 2045, replacing and updating the Local Plan 2011-2031.

1.1.4 A call for sites ran alongside the Issues and Options consultation between the 31st October 2023 and 2nd February 2024. The Issues and Options consultation sought views on appropriate options to address various issues identified for the local area and included options for how and where development needs can be met. The Council is now at the Preferred Options Stage at Regulation 18. The Preferred Options consultation addresses a number of topics and presents the preferred approach to addressing them. It contains a range of draft policies and development site allocations.

² Rugby Borough Council (2019) Rugby Borough Council Local Plan 2011-2031.

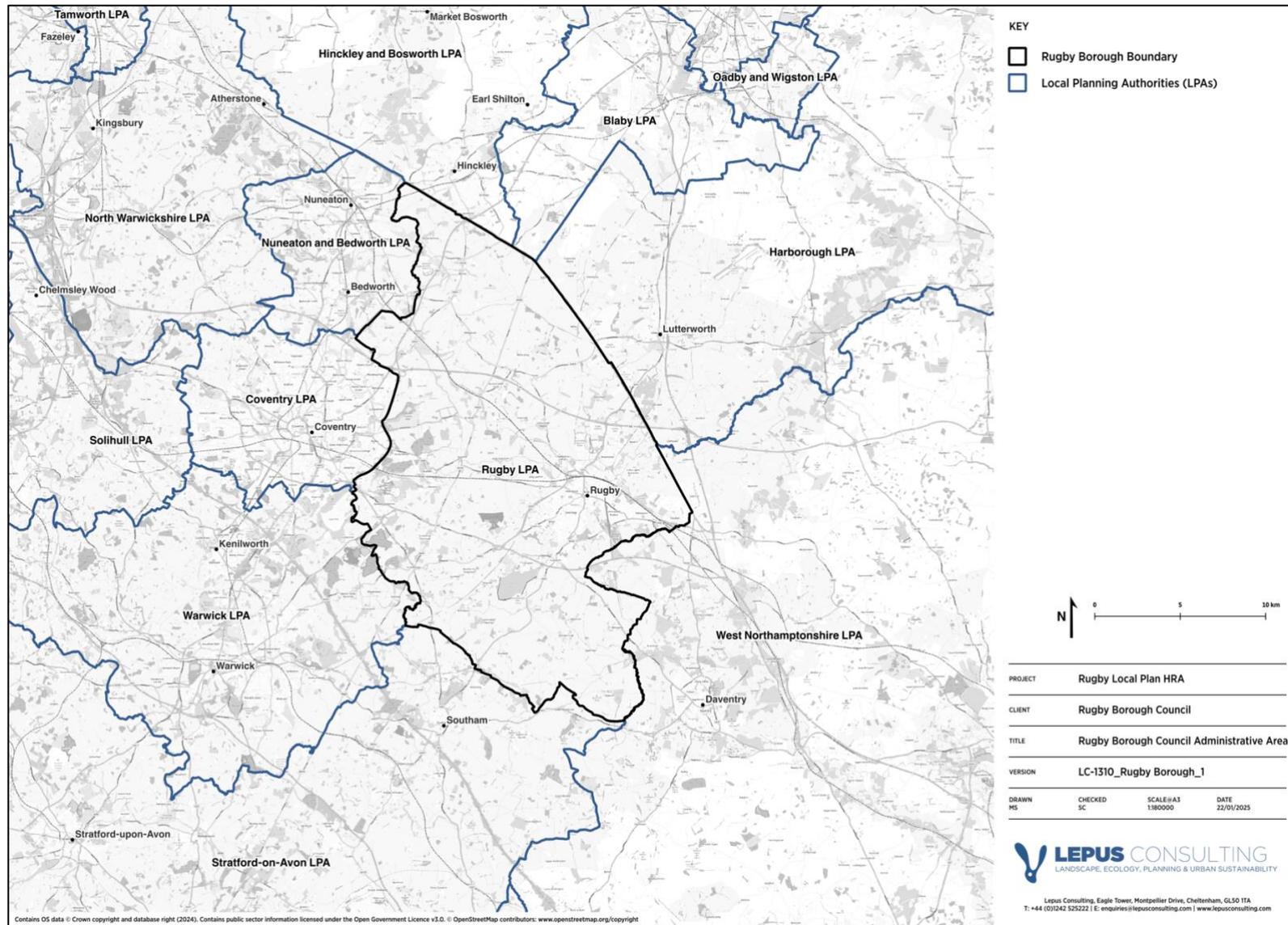


Figure 1.1: Rugby administrative area

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)³. 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 a European site, under Regulation 105 of the Habitats Regulations, the plan making authority for that plan must, before the plan is given effect, make an Appropriate Assessment (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 To ensure that outputs from the HRA are incorporated into the Local Plan, it is important that the HRA process begins at the early stages of the plan making process. This allows for adverse impacts to be avoided in the first instance through the strategic planning of options or, where this is not possible, effective mitigation. Mitigation measures can then be designed to avoid, cancel, or reduce significant effects following the mitigation hierarchy. Such measures may take the form of guiding principles and policy requirements, drawing on existing best practice. Should mitigation not be possible, there may be a need to consider alternatives which may require some more complex changes to a plan. The HRA process is therefore running alongside the plan making process.

1.2.4 The Habitats Regulations⁴ provide a definition of a European site at Regulation 8. These sites include Special Areas of Conservation (SAC), Sites of Community Importance, Special Protection Areas (SPA) 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 a European site⁵:

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

³ The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

⁴ Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

⁵ Ministry of Housing and Communities & Local Government (2025). National Planning Policy Framework. Para 194.

1.3 Previous HRA work

- 1.3.1 The Rugby Local Plan 2011-2031 was adopted on 4th June 2019⁶ and sets out a development strategy and planning policies. It was supported by an HRA which was undertaken iteratively throughout plan preparation⁷. This screening HRA report 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 pathways of impact. The HRA concluded that there would be no adverse impacts on the integrity of European sites either alone or in-combination and provided recommendations.

1.4 Purpose of this report

- 1.4.1 Lepus Consulting has prepared this HRA Screening Report on behalf of Rugby Borough Council to inform the plan-making process at the Preferred Options consultation stage at Regulation 18.

⁶ Rugby Borough Council. Local Plan 2011-2031 Adoption. Available at: <https://www.rugby.gov.uk/w/local-plan-2011-31-adoption> [Accessed 22/01/25].

⁷ Ecological Services (December 2018) Final Screening Report and Formal Screening Decision Habitat Regulations Assessment (HRA) for Rugby Borough Council Local Plan 2018.

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**. This HRA report provides outputs from Stage 1 of the HRA process – Screening.

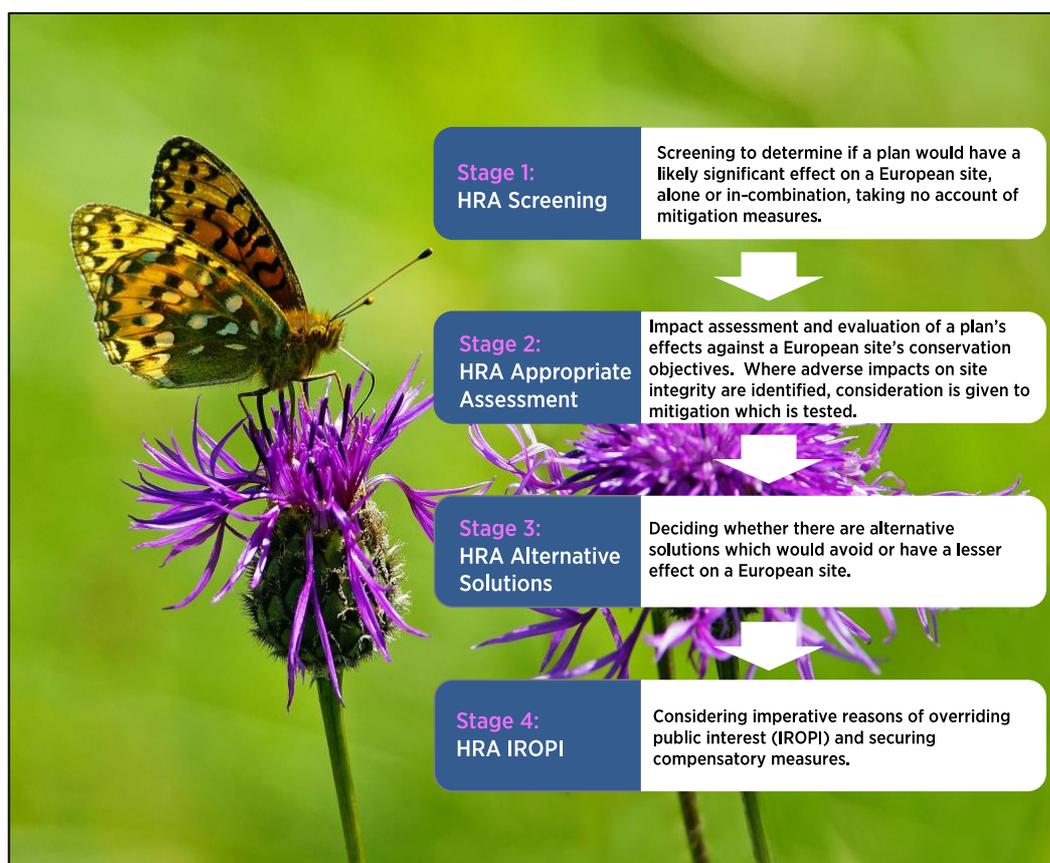


Figure 2.1: Stages in the Habitats Regulations Assessment process⁸

⁸ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (January) (2021) 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) whether it can be excluded (because it is not a plan), or (3) 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 the plan which may lead to a Likely Significant Effect (LSE) at a European site, either alone or in-combination with other plans or projects.
- 2.2.2 Where elements of the Local Plan will not result in an LSE on a European site (alone or in-combination) these are screened out and not considered in further detail in the 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 or not a plan component is likely to have LSEs alone or in-combination. These codes 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 Handbook⁹

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
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

2.2.3 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-323/17¹⁰) determined that mitigation measures are only permitted to be considered as part of the Appropriate Assessment stage of the HRA process. The HRA screening process has therefore taken no account of incorporated mitigation or avoidance measures that are intended to avoid or reduce harmful effects on a European site when assessing the LSEs of the Local Plan on European sites. 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.

⁹ 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: 22/10/24].

¹⁰ InfoCuria (2018) Case C-323/17. Available at: <http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN> [Date Accessed: 13/02/25].

2.2.4 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 combine to 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.

2.2.5 Plans and projects which are considered to be of most relevance 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. 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 transport¹¹, waste¹² and mineral plans¹³, 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, neighbouring authority local plans (listed below and detailed in **Appendix A**) which may increase development related pressures at European sites will be considered. It is recognised that the status of other plans and projects will change over the timescale of the Local Plan plan-making process.

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

2.2.6 The approach taken to the consideration of in-combination effects will be compliant with the Wealden Judgement¹⁴ which requires an in-combination approach that considers the development of neighbouring and nearby authorities when assessing LSEs.

¹¹ Transport for West Midlands. Local Transport Plan. Available at: <https://www.tfwm.org.uk/who-we-are/our-strategy/local-transport-plan/> [Date Accessed: 23/01/25].

¹² Warwickshire County Council (2013) Waste Core Strategy. Available at: <https://www.warwickshire.gov.uk/mineral-waste-plans/waste-development-framework/1> [Date Accessed: 13/02/25].

¹³ Warwickshire County Council (2022) Warwickshire Minerals Local Plan. Available at: <https://www.warwickshire.gov.uk/mineral-waste-plans/minerals-development-framework> [Date Accessed: 13/02/25].

¹⁴ 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: 13/02/25].

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 objectives¹⁵.

2.3.2 As part of this process, plan makers should take account of the potential consequences of no action, the uncertainties inherent in scientific evaluation and they should consult interested parties on the possible ways of managing the 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 The AA aims to present information in respect of all aspects of the Local Plan and ways in which it could, either alone or in-combination with other plans and projects, impact a European site. 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.

2.3.4 An AA is not provided within this report as it does not form part of this commission.

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 of September 2004 'Waddenzee' ruling¹⁶:

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."

¹⁵ Department of Levelling Up, Housing and Communities (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment.

¹⁶ EC Case C-127/02 Reference for a Preliminary Ruling 'Waddenzee' 7th September 2004 Advocate General's Opinion (para 107).

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 air-borne 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 Appropriate Assessment 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'¹⁷.

¹⁷ Ministry of Housing and Communities (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment.

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 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**.
- 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 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 periodically assesses the conservation conditions of each SSSI unit, assigning it a status. The conservation status of each SSSI highlights any European site that is currently particularly vulnerable to threats/pressures. Conservation status is defined as follows:
- Favourable;
 - Unfavourable – recovering;
 - Unfavourable – no change; or,
 - Unfavourable – declining.
- 3.3.5 SSSI units in either an 'Unfavourable – no change' or 'Unfavourable – declining' condition indicate that the European site may be particularly vulnerable to certain threats or pressures. It is important to remember that the SSSI may be in an unfavourable state due to the condition of features unrelated to its designation as a European site. However, it is considered that the conservation status of SSSI units that overlap with European sites offer a useful indicator of habitat / species health at a particular location.
- 3.3.6 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.

3.3.7 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'¹⁸. 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.

3.3.8 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 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)¹⁹. 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)²⁰.
- **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 has the potential to affect functionally linked land (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.

¹⁸ 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: 22/10/24].

¹⁹ "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.

²⁰ APIS (2016) Ecosystem Services and air pollution impacts.

- **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 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. The exact location, scale and nature of this development is not known at this stage in the plan making process.

3.3.9 European sites assessed in this HRA report are identified in **Table 3.1** and illustrated in **Figures 3.1 to 3.3**. The inclusion of European sites has taken into consideration a review of pathways of impact (for instance hydrological connectivity), a 20km buffer from the Plan area and previous HRA work undertaken in support of the 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

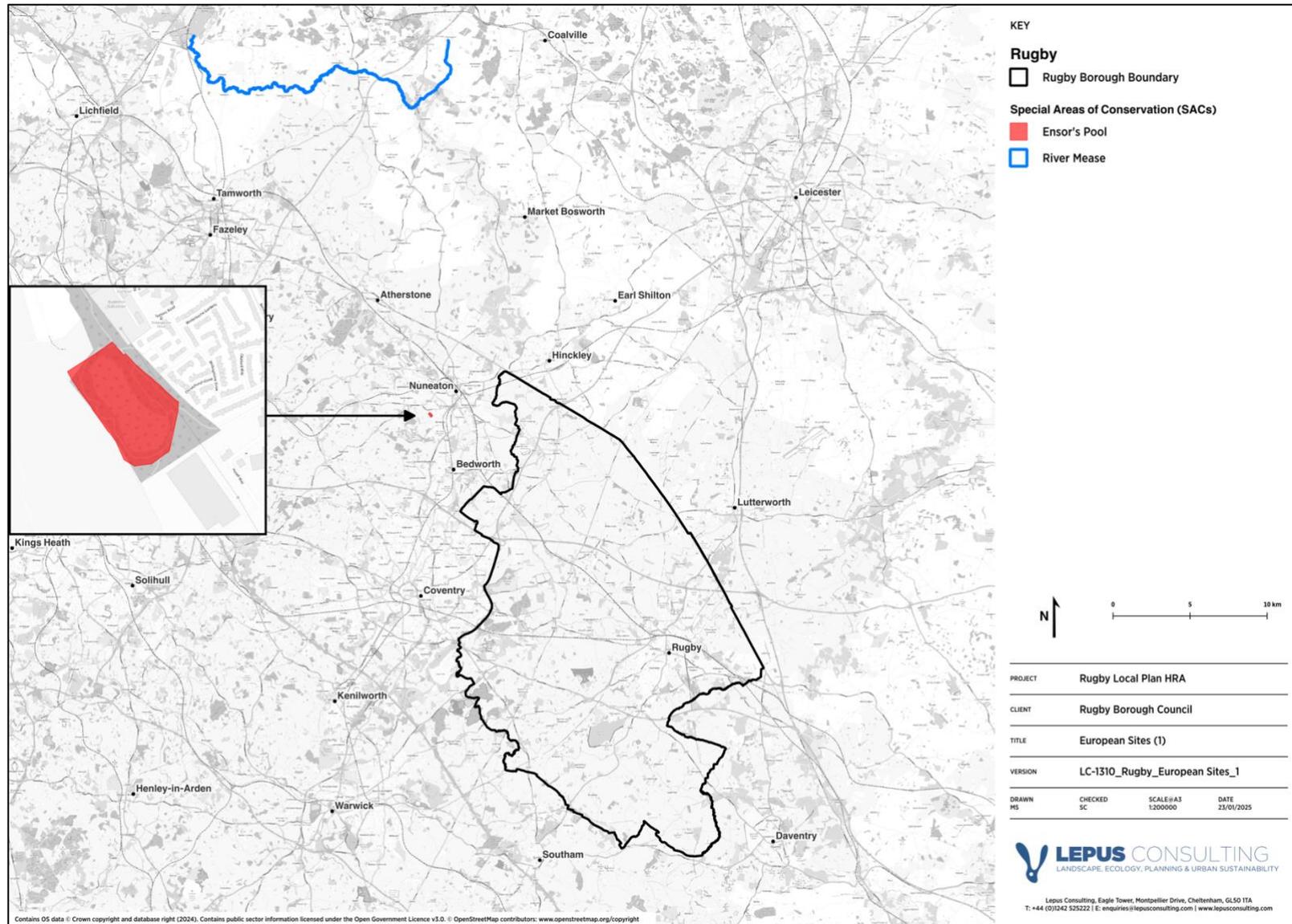


Figure 3.1: European sites located within HRA search area (1)

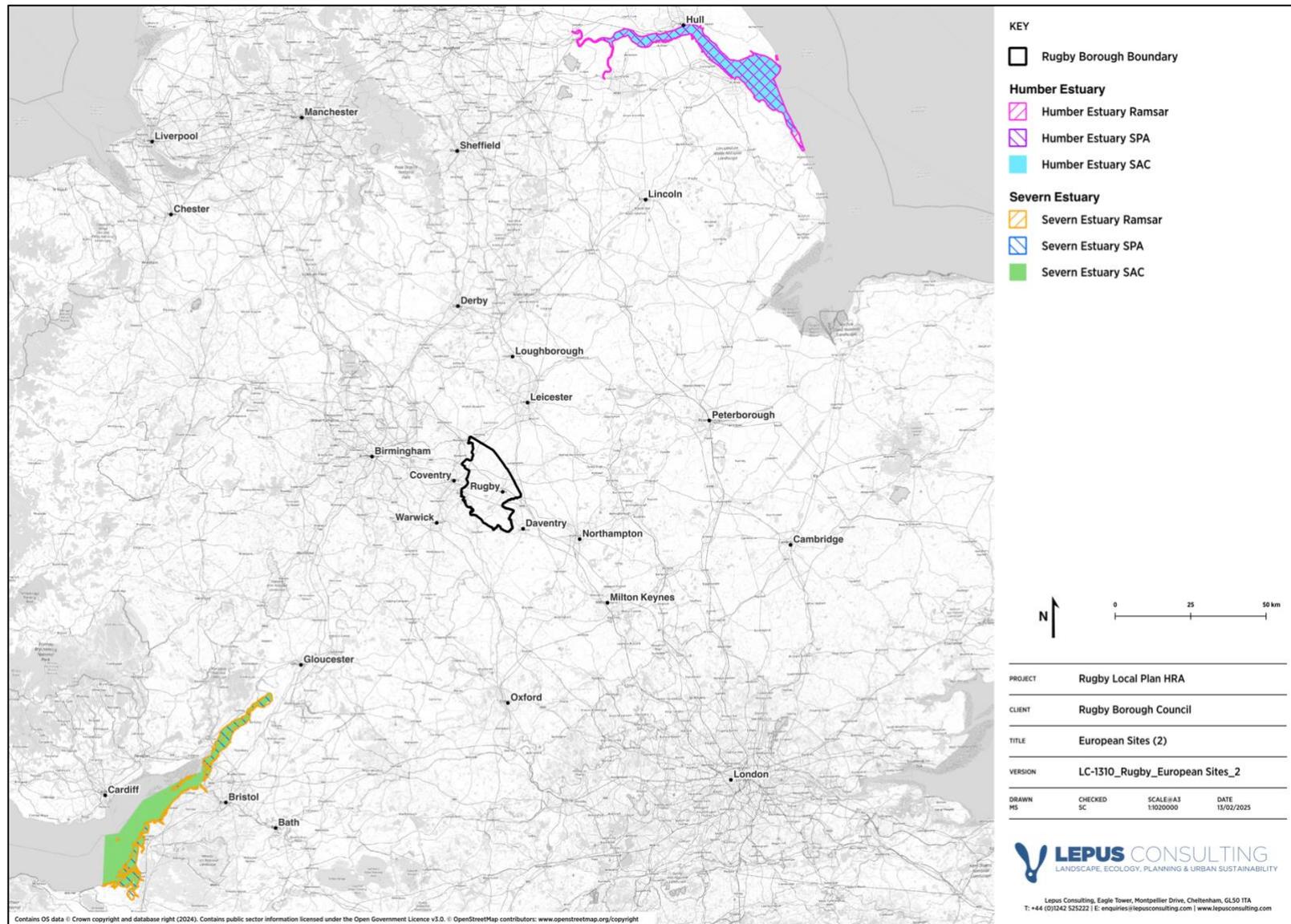


Figure 3.2: European sites located within HRA search area (2)

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 knowledge²¹. 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 knowledge²².

²¹ UNECE. ICP Modeling and Mapping Critical loads and levels approach. Available at: https://www.umweltbundesamt.de/en/Coordination_Centre_for_Effects [Date Accessed: 22/10/24].

²² UNECE. ICP Modeling and Mapping Critical loads and levels approach. Available at: https://www.umweltbundesamt.de/en/Coordination_Centre_for_Effects [Date Accessed: 22/10/24].

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 flows²³. In addition, the Institute of Air Quality Management (IAQM)²⁴ and the Chartered Institute of Ecology and Environmental Management (CIEEM)²⁵ 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 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 boundary²⁶. 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'²⁷. 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**).

²³ 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: 22/10/24].

²⁴ 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.

²⁵ CIEEM (2021) Advice on Ecological Assessment of Air Quality Impacts. Chartered Institute of Ecology and Environmental Management. Winchester, UK.

²⁶ 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> [Accessed 11/07/24].

²⁷ JNCC. Nitrogen Future. Available at: <https://jncc.gov.uk/our-work/nitrogen-futures/> [Date Accessed: 22/10/24].

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 area²⁸. 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 (**paragraph 3.4.10**) 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^{29,30,31}. 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 (Table 3.2). As shown in **Table 3.2**, 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 stage of screening needs to be undertaken.

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;

²⁸ 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: 23/01/25].

²⁹ 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.

³⁰ Natural England (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report NECR 199.

³¹ Bignal, K., Ashmore, M. & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

- Reduce quality of surface water run off; and
- Increased effluent discharge for treatment.

- 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 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)³².
- 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 with 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 with 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. 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 (SWMPs)³³. The Plan area is located predominantly within 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 3.1**.

³² 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: 22/10/24].

³³ Department for Environment Food & Rural Affairs. River basin districts, England. Available at: <https://environment.data.gov.uk/catchment-planning/> [Date Accessed: 23/01/25].

- 3.5.7 It is noted that the Plan area does not lie with the River Mease SAC nutrient neutrality catchment³⁴.
- 3.5.8 River Basin Management Plans (RBMP) 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 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. ALS 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 catchment³⁵, with a small area to the north east within the Soar³⁶, and a small area to the north within the Tame, Anker and Mease³⁷ 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-Flows (HoF)³⁸ of 2,568 ml/d at the lower end of the River Severn at Deerhurst gauging station to safeguard flows³⁹.

³⁴ 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: 22/10/24].

³⁵ Environment Agency (2023) Warwickshire Avon Abstraction Licensing Strategy. Available at:

<https://assets.publishing.service.gov.uk/media/642e90bc7de82b0012313726/Warwickshire-Avon-ALS.pdf> [Date Accessed: 24/01/25].

³⁶ Environment Agency (2020) Soar Abstraction Licensing Strategy. Available at:

https://assets.publishing.service.gov.uk/media/5f574829e90e070995ad8255/Soar_Abstraction_Licensing_Strategy.pdf [Date Accessed: 24/01/25].

³⁷ 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: 24/01/25].

³⁸ 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.

³⁹ 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: 24/01/25].

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'⁴⁰. 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**).

⁴⁰ Severn Trent. A1 Water Resource Zones. Available at:

https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.severntrent.com/content/dam/stw/ST_Corporate/About_us/Docs/Appendix-A-How-much-water-do-we-have-available.pdf&ved=2ahUKEwiY8ei5gu2GAxXkZ0EAHUC5D_kQFnoECB0QAQ&usg=AOvVaw3uO8-LrFuwwJ2kHu2ixaCT [Date Accessed: 22/10/24].

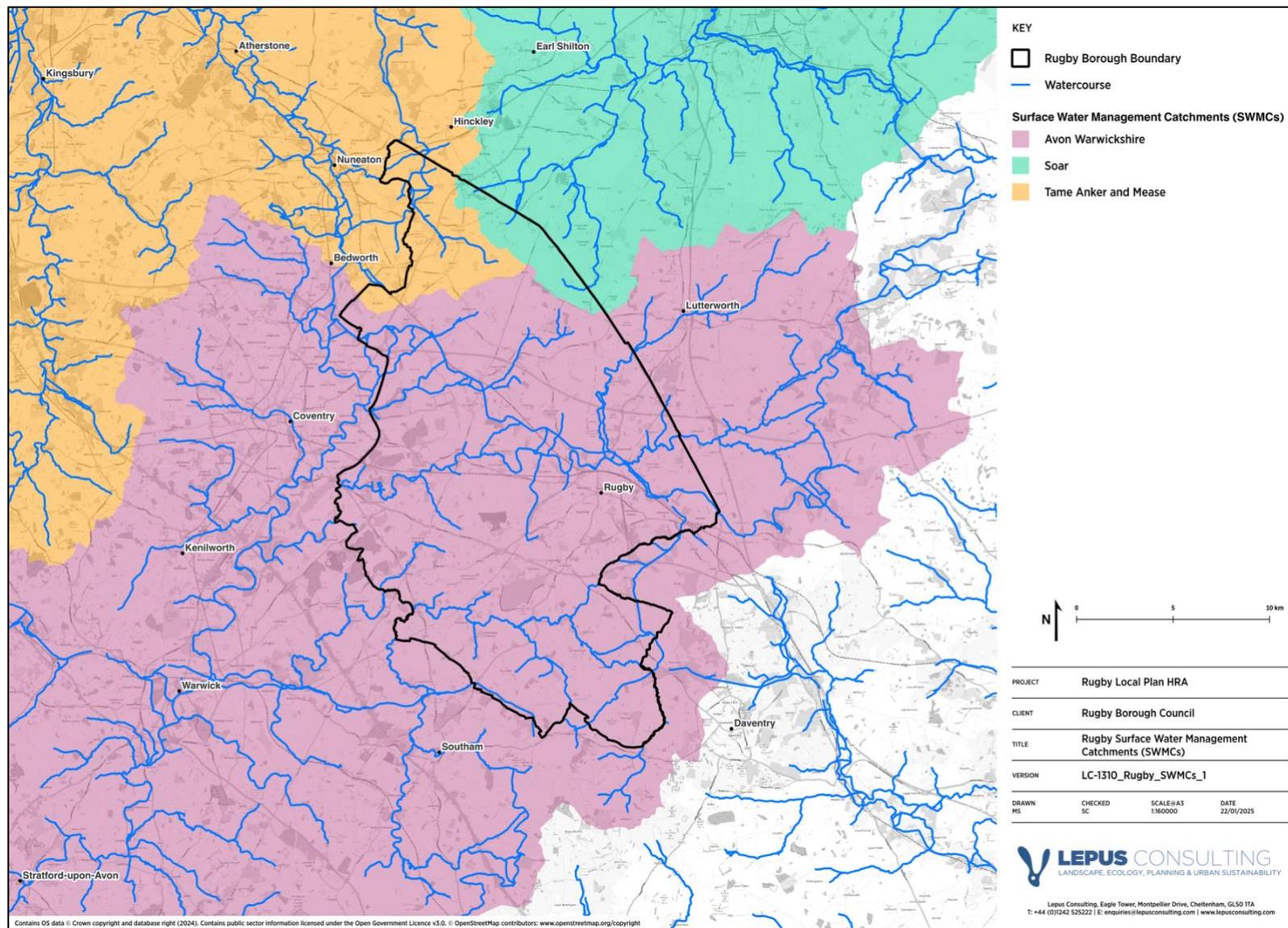


Figure 3.3: Rugby Surface Water Management Catchments (SWMCs)

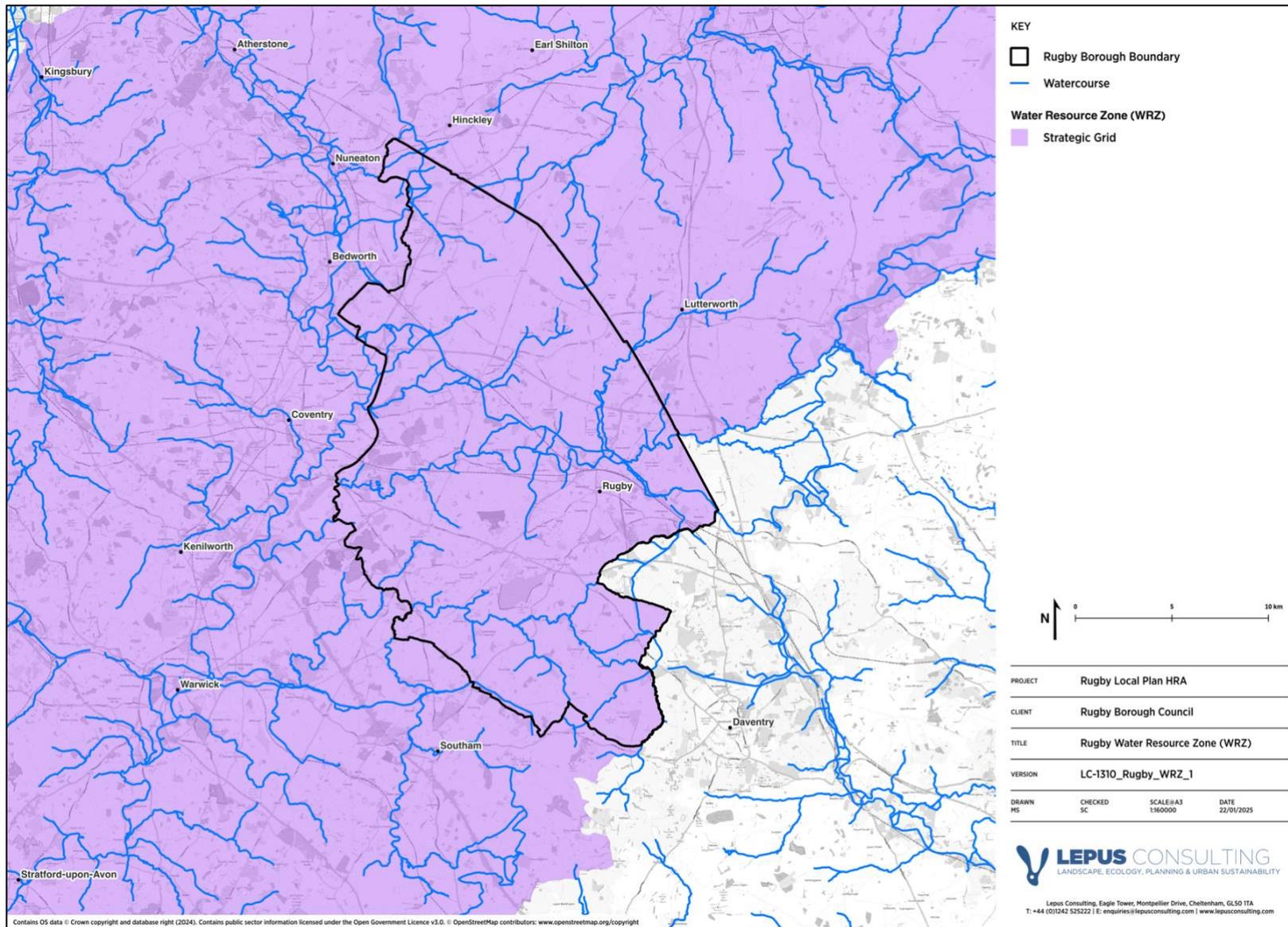


Figure 3.4: Rugby Water Resource Zones (WRZs)

- 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. It is a statutory requirement that every five years water companies produce and publish a Water Resources Management Plan (WRMP). The 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 Severn Trent Water's WRMP had not been published at the time of writing. The draft plan is however available and covers the period from 2025 to 2050⁴¹. Water supply is provided from a mix of reservoirs, rivers and groundwater⁴². The WRMP outlines a number of demand management measures that need to be taken to ensure continued sustainable sources of supply including demand management (such as smart metering and home efficiency checks), leakage reduction and sustainable abstraction. The largest planned schemes which are still being considered through the WRMP drafting process involve transfers out of the WRZ to support other WRZs and an expansion of water treatment works.
- 3.5.15 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 Severn Trent Water Drought Plan covers the period from 2022 to 2027⁴³. This sets out a series of actions to address droughts including actions to reduce customer demand for water and identifies catchments (including the River Avon) where drought orders and permits may be required.
- 3.5.16 Severn Trent Water 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 development⁴⁴.

⁴¹ Severn Trent Water (2022) draft Water Resource Management Plan.

⁴² JBA Consulting (2024) Coventry and Warwickshire Sub-Regional Water Cycle Study – Stage 1.

⁴³ Severn Trent Water (2022) Final Drought Plan.

⁴⁴ JBA Consulting (2024) Coventry and Warwickshire Sub-Regional Water Cycle Study – Stage 1.

- 3.5.17 A Stage 1 Water Cycle Study (WCS)⁴⁵ was undertaken on behalf of LPAs within the sub-region including Rugby Borough Council⁴⁶. This study assesses the impacts on water supply, wastewater collection and treatment and water quality from future Local Plan development. Severn Trent Water 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.
- 3.5.18 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 WCS will be undertaken as part of the plan-making process which will include water quality modelling at receptors downstream of WwTWs to enable a detailed assessment of water quality impacts from new growth.
- 3.5.19 As noted in **paragraph 3.5.5**, 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 sites 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.
- 3.5.20 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 (listed earlier) and additionally species of Salmon (*Salmo salar*), Sea Trout (*S. trutta*), Allis Shad (*Alosa alosa*) and European eel (*Anguilla anguilla*).
- 3.5.21 The 'Unlocking the Severn' project⁴⁷, which is run in partnership between the Canal and Rivers Trust, the Severn Rivers Trust, the Environment Agency 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 catchment⁴⁸.

⁴⁵ JBA Consulting (2024) Coventry and Warwickshire Sub-Regional Water Cycle Study – Stage 1.

⁴⁶ 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.

⁴⁷ Rivers and Canals Trust. Unlocking the Seven Project. Available at: <https://unlockingthesevern.co.uk/our-fish-passes/> [Date Accessed: 24/10/24].

⁴⁸ Environment Agency (2022) Severn River Basin Management Plan. <https://www.gov.uk/guidance/severn-river-basin-district-river-basin-management-plan-updated-202> [Date Accessed: 24/10/24].

- 3.5.22 Communication with Natural England 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).
- 3.5.23 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 watercourse⁴⁹.
- 3.5.24 Taking into consideration potential changes in water supply (through abstraction for water supply) and water quality (through surface water run-off and discharges from WWTWs), European sites were screened for potential hydrological pathways of impact. 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 (**Section 4**) for further consideration in the HRA process in terms of hydrology pathways of impact.

⁴⁹ 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: 24/10/24].

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 /or water level impacts 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 ground water 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 SAC⁵⁰.</p> <p>As part of the HRA work undertaken in support of the adopted Warwickshire Minerals Plan HRA, the Environment Agency recommended application of a 3km catchment within which water impacts are likely⁵¹. Taking into account the distance of the SAC from the Plan area (approximately 4km to the west) and the fact that the SAC is ground water fed, there are unlikely to be water receptors that connect development proposed in the Local Plan with the SAC.</p>	No
River Mease SAC	<p>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 lie with the River Mease SAC nutrient neutrality catchment⁵² and is not hydrologically linked to the Plan area.</p>	No
<p>Severn Estuary SAC</p> <p>Severn Estuary Ramsar</p>	<p>The Plan area is predominantly located within the River Severn District Basin and the Avon Warwickshire SWMC. The Severn Estuary SAC and Severn Estuary Ramsar are 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.</p>	Yes
<p>Humber Estuary SAC</p> <p>Humber Estuary Ramsar</p>	<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 and Humber Estuary Ramsar are 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 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.</p>	Yes

⁵⁰ Natural England (2014) Site Improvement Plan: Ensor's Pool. Available at: <https://publications.naturalengland.org.uk/publication/5364843502632960> [Date Accessed 24/01/25].

⁵¹ 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: 25/10/24].

⁵² 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: <https://publications.naturalengland.org.uk/publication/5254733043597312> [Date Accessed: 22/10/24].

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 km⁵³. 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**).

⁵³ 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 Ensor's Pool 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'⁵⁴. 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 for the SAC. Although angling is prohibited on Ensor's Pool, unauthorised fishing does take place⁵⁵. Given the proximity of Ensor's Pool SAC to the Plan area (4km) 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.

3.7.2 As with recreational impacts, urbanisation mitigation strategies have been implemented across the UK through the establishment of buffer zones. Commonly applied urbanisation Zones of Influence extend around 400m from the edge of a designation as this reflects likely impacts from pets (e.g. cat predation) and the distance from which people access a site on foot.

3.7.3 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, Ensor's Pool SAC, located 4km to its west west. Therefore, the Local Plan is unlikely to have an urbanisation effect upon any European site and this pathway of impact 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.

⁵⁴ 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: 25/10/24].

⁵⁵ 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 and/or Quality Changes Impact Pathway?	Recreational Pressure Impact Pathway?	Urbanisation Impact Pathway?
Ensor's Pool SAC	No	No	Yes	No
Humber Estuary Ramsar	No	Yes	No	No
Humber Estuary SAC	No	Yes	No	No
Humber Estuary SPA	No	No	No	No
River Mease SAC	No	No	No	No
Severn Estuary Ramsar	No	Yes	No	No
Severn Estuary SAC	No	Yes	No	No
Severn Estuary SPA	No	No	No	No

4 Screening Preferred Options

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 screens each component of the Regulation 18 Preferred Options 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. In order to identify LSEs upon European sites, each component of the Preferred Options 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 ruling⁵⁶.

4.2.2 The screening exercise will be revisited at Regulation 19 to capture any changes in policy wording or allocations made as the Local Plan continues to be developed and in response to the Regulation 18 consultation.

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

4.2.4 The following components in the Local Plan were however considered to have an LSE in-combination with other plans and projects:

⁵⁶ InfoCuria (2018) Case C-323/17. Available at:

<http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN> [Date Accessed: 25/10/24].

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
I6	Secondary education	L

4.2.5 Likely significant in-combination water quality effects were identified for all development allocations (**Figure C.1**) 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.

4.3 Further HRA work requirements

4.3.1 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 next stage of the HRA process will be Stage 2 - AA.

4.3.2 It is too early at this stage of the Plan making process to undertake a full AA as key pieces of evidence are in preparation, and these will inform the details within the Local Plan.

- 4.3.3 As set out in **Section 3.5**, the Stage 1 WCS⁵⁷ outlines the requirement for a Stage 2 WCS as part of the plan-making process. This will include water quality modelling at receptors downstream of WwTWs to enable a detailed assessment of water quality impacts from new growth due to discharges of treated wastewater. The WCS water quality modelling will take into consideration the full volume of growth from the Local Plan and also the contribution of growth from neighbouring Local Planning Authority (LPA) areas within the catchments of affected WwTWs (i.e. the in-combination impact). This modelling will be applied to watercourses adjacent to, or as close as possible to, European sites with hydrological connectivity, including functionally linked watercourses. Outputs will be assessed to determine the significance of effect which will be indicated by a change in water quality of 10% or more, or a decrease in WFD class. Water quality modelling undertaken as part of the WCS will inform a consideration of in-combination water quality impacts at functionally linked watercourses associated with the Severn Estuary and Humber Estuary designations through an AA at Regulation 19.
- 4.3.4 At Regulation 19 a review will be undertaken in terms of accessibility from each allocation to Ensor's Pool and alternative recreational spaces provided in the Plan area.

⁵⁷ JBA Consulting (2024) Coventry and Warwickshire Sub-Regional Water Cycle Study – Stage 1.

5 Next Steps

5.1 Conclusions

5.1.1 This HRA report provides an assessment of the Local Plan which includes policy directions. It screens in the following LSEs at European sites:

- Ensor's Pool SAC – recreation LSE;
- Humber Estuary SAC – water quality LSE on functionally linked watercourses;
- Humber Estuary Ramsar – water quality LSE on functionally linked watercourses;
- Severn Estuary SAC – water quality LSE on functionally linked watercourses; and
- Severn Estuary Ramsar – water quality LSE on functionally linked watercourses.

5.1.2 This report also identifies information required to inform the AA at the Regulation 19 stage of the Plan making process. No conclusions have been drawn at this stage in the process in terms of adverse impacts on the site integrity of any European site (alone or in combination).

5.2 Next Steps

5.2.1 Screening will be revisited at Regulation 19 when the Local Plan is further developed to take into consideration any changes.

5.2.2 The Regulation 19 HRA will be informed by outputs from the Stage 2 WCS and take into consideration the high-level protective water framework and the Local Plan policy wording.

5.2.3 At Regulation 19 a full AA will be presented in support of the Publication version of the Local Plan which will allow the Council, as the Competent Authorities, to make the Integrity Test. The Council will take into consideration representations from Natural England under the provisions of the Habitats Regulations.

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 is aiming to produce the Regulation 19 version of the Local Plan by July 2025.</p>	n/a	<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). 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>The Cherwell Local Plan Review 2040 Proposed Submission Document (Regulation 19)³ underwent consultation from 19</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 HRA report was completed in November 2024 which concluded that the Local Plan review would not have an adverse effect on the integrity of any European sites either alone or in-combination with other plans or projects.</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>

¹ Blaby District Council. New Local Plan. Available at: <https://www.blaby.gov.uk/planning-and-building/local-plan/new-local-plan/> [Date Accessed: 27/01/25].

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: 27/01/25].

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: 27/01/25].

Plans and Policies	Plan Status	Summary of housing/employment	Potential in-combination LSE
	December 2024 – 25 February 2025.		
Coventry Local Plan ⁴	<p>Coventry City Council adopted its Local Plan to 2031 and Area Action Plan in December 2017.</p> <p>The Local Plan Review is currently being reviewed with the Regulation 19 consultation taking place from 20 January to 3 March 2025.</p>	<p>The Local Plan sets out the provision of a minimum of 29,100 additional homes and 60ha of employment land.</p> <p>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.</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>
Harborough Local Plan ⁵	<p>The Council adopted the Local Plan 2011-2031 in 2019.</p> <p>The Local Plan is currently being reviewed. An Issues and Options consultation ran from 16 January to 27 February 2024.</p>	<p>An HRA screening report supported the adoption of the Local Plan 2011-2031. The HRA concluded no adverse effects on European sites either alone or in-combination as a result of the plan.</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>

⁴ Coventry City Council. About the Local Plan Review. Available at: <https://www.coventry.gov.uk/planning-policy/local-plan-review> [Date Accessed: 27/01/25].

⁵ 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: 27/01/25].

Plans and Policies	Plan Status	Summary of housing/employment	Potential in-combination LSE
Hinckley and Bosworth Local Plan ⁶	<p>The Council is in the process of reviewing and updating the Local Plan.</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>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 HRA⁷ 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>
Leicester Local Plan ⁸	<p>The Local Plan 2020-2036 Regulation 19 consultation ran from 16 January 2023 to 27 February 2023.</p> <p>The Local Plan 2020 to 2036⁹ has been submitted for examination.</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 HRA¹⁰ was conducted in support of the Local Plan. It concluded no adverse impacts on the integrity of European</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</p>

⁶ Hinckley and Bosworth Borough Council. Local Plan Review 2020-2041.

⁷ JBA Consulting (September 2020) Hinckley & Bosworth Local Plan – Scope, Issues and Options. Shadow Habitat Regulations Assessment Screening Report Draft. Available at: file:///Users/mia.stukins/Downloads/Shadow_Habitat_Regulations_Assessment_Screening.pdf [Date Accessed: 27/01/25].

⁸ Leicester City Council. Leicester Local Plan – Publication Draft 2020-2036 Consultation (Ref version). Available at: <https://consultations.leicester.gov.uk/sec/9bbe1eaa/> [Date Accessed: 27/01/25].

⁹ 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: 27/01/25].

¹⁰ Leicester City Council (September 2022) Local Plan Habitats Regulations Appropriate Assessment Screening Report. Available at: <https://www.leicester.gov.uk/media/viqe4rl4/habitats-regulation-assessment-hra.pdf> [Date Accessed: 27/01/25].

Plans and Policies	Plan Status	Summary of housing/employment	Potential in-combination LSE
		sites alone or in-combination as a result of the Local Plan. Therefore, a full AA is not required.	and neighbouring LPA areas where they feed into the same WwTWs.
North Warwickshire Local Plan ¹¹	The Local Plan was adopted in September 2021.	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. An HRA 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.	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.
Nuneaton and Bedworth Local Plan ¹²	The Borough Plan Review (2021-2039) was submitted for examination in February 2024.	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 HRA ¹³ 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

¹¹ North Warwickshire Borough Council. Local Plan for North Warwickshire. Available at: <https://www.northwarks.gov.uk/forward-planning/local-plan-north-warwickshire> [Date Accessed: 27/01/25].

¹² Nuneaton and Bedworth Borough Council. Borough Plan. Available at: <https://www.nuneatonandbedworth.gov.uk/adopted-borough-plan/borough-plan-1> [Date Accessed: 27/01/25].

¹³ 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: 27/01/25].

Plans and Policies	Plan Status	Summary of housing/employment	Potential in-combination LSE
			proposed in both the Plan area and neighbouring LPA areas where they feed into the same WWTWs.
Oadby and Wigston Local Plan ¹⁴	The Council is in the process of preparing a new Local Plan. The Regulation 19 consultation is running from 10 January to 21 February 2025.	The Local Plan sets out the provision of 3,481 dwellings (205 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. An HRA ¹⁵ was conducted in support of the Local Plan. It concluded no adverse impacts on the integrity of any 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 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.
Solihull Local Plan ¹⁶	The Local Plan was adopted by the Council on 3rd December 2013. In May 2021, the Council submitted the Local Plan Review for examination. The Local Plan review was withdrawn in September 2024.	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.	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

¹⁴ 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: 25/01/25].

¹⁵ 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_n_november_2024/Regulation%2019%20Habitat%20Regulations%20Assessment%20Report%20-%20November%202024.pdf [Date Accessed: 27/01/25].

¹⁶ 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 Assessed: 25/10/24].

Plans and Policies	Plan Status	Summary of housing/employment	Potential in-combination LSE
			which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.
Stratford-on-Avon Local Plan ¹⁷	<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 Plan¹⁸. The Councils are currently at the Preferred Options stage. The Preferred Options consultation is running from 10 January to 7 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. An HRA¹⁹ 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>
Tamworth Local Plan ²⁰	<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</p>	<p>The Local Plan 2006-2031 sets out the provision of a minimum of 4,425 dwellings (177 dwellings pr 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</p>

¹⁷ Stratford-on-Avon District Council. Core Strategy. Available at: <https://www.stratford.gov.uk/planning-building/core-strategy.cfm> [Date Accessed: 27/01/25].

¹⁸ Warwick District Council & Stratford-on-Avon District Council. Available at: <https://www.southwarwickshire.org.uk/swlp/> [Date Accessed: 27/01/25].

¹⁹ 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].

²⁰ Tamworth Borough Council. Local plans. Available at: <https://www.tamworth.gov.uk/planning/local-plans> [Date Accessed: 27/01/25].

Plans and Policies	Plan Status	Summary of housing/employment	Potential in-combination LSE
	gathering stage and has conducted an Issues and Options consultation.		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.
Warwick District Council Local Plan ²¹	The Local Plan 2011-2029 was adopted in September 2017. Stratford-on-Avon and Warwick District Councils are currently working together to prepare a new local plan for South Warwickshire ²² . The Councils are currently at the Preferred Options stage. The Preferred Options consultation is running from 10 January to 7 March 2025.	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. An HRA ²³ 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.	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.
West Northamptonshire Local Plan ²⁴	The Council is currently preparing a new Local Plan to guide development up to 2041. Consultation on a Regulation 18	The Local Plan sets out the provision of 39,150 new dwellings over the Plan period.	Yes. This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked

²¹ Warwick District Council. Warwick District Local Plan 2011-2029. Available at: https://www.warwickdc.gov.uk/info/20410/local_plan [Date Accessed: 27/01/25].

²² Warwick District Council & Stratford-on-Avon District Council. Available at: <https://www.southwarwickshire.org.uk/swlp/> [Date Accessed: 27/01/25].

²³ 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].

²⁴ 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: 27/01/25].

Plans and Policies	Plan Status	Summary of housing/employment	Potential in-combination LSE
	Draft Plan ran between April and June 2024.	An HRA ²⁵ 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.	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.
Warwickshire Local Transport Plan ²⁶ (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.
Warwickshire Minerals Local Plan ²⁷	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 HRA ²⁸ 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 7 Preferred Sites. It also	Yes. This plan will trigger change or development adjacent to the Plan area. There is potential for in-combination hydrology LSEs.

²⁵ 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: 27/01/25].

²⁶ Warwickshire County Council (2023) A New Local Transport Plan for Warwickshire (LTP4) . Available at: <https://www.warwickshire.gov.uk/localtransportplan> [Date Accessed: 25/10/24].

²⁷ Warwickshire County Council (2022) Warwickshire Minerals Local Plan 2018 – 2032. Available at: <https://www.warwickshire.gov.uk/mineralslocalplan> [Date Accessed: 25/10/24].

²⁸ 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: 25/10/24].

Plans and Policies	Plan Status	Summary of housing/employment	Potential in-combination LSE
		considered migratory fish species relate to the Humber SAC, SPA and Ramsar site.	
Warwickshire Waste Core Strategy ²⁹	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 HRA 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.
Severn River Basin Management Plan (RBMP)	The Severn RBMP was updated in October 2022 ³⁰ .	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 ³¹ . 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 (an 'appropriate assessment' to examine the question of adverse effects on the integrity of European sites). 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	Yes. The in-combination impact of development on the achievement of aims in the RBMP will be considered in the HRA process.

²⁹ 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: 25/10/24].

³⁰ 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: 25/10/24].

³¹ 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: 25/10/24].

Plans and Policies	Plan Status	Summary of housing/employment	Potential in-combination LSE
		the HRA. The HRA also draws on detailed mitigation measures and procedures currently in place.	
Humber River Basin Management Plan (RBMP)	The Humber RBMP was updated in October 2022 ³² .	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 HRA ³³ . 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 (an 'appropriate assessment' to examine the question of adverse effects on the integrity of European sites). 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.
Severn Trent Water Resources Management Plan (WRMP) ³⁴ .	Severn Trent Water's WRMP had not been published at the time of writing. The draft plan is however available and covers the period from 2025 to 2050	The draft WRMP describes a likely future supply / demand deficit of 244MI/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 licenses will be capped to	Yes. The outputs of the WRMP will be taken into consideration in the consideration of in-combination water impacts in the HRA process.

³² 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: 25/10/24].

³³ 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: 25/10/24].

³⁴ 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: 25/10/24].

Plans and Policies	Plan Status	Summary of housing/employment	Potential in-combination LSE
		<p>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 rivers to improve habitats and ecological resilience to low flows.</p> <p>The WRMP was supported by an HRA³⁵. 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>	
<p>Severn Trent Water Drought Plan³⁶</p>	<p>The Severn Trent Drought Plan was prepared in 2022.</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</p>	<p>Yes. The outputs of the Drought Plan will be taken into consideration in the consideration of in-combination water impacts in the HRA process.</p>

³⁵ Severn Trent Water (2022) Habitats Regulations Assessment: Draft Water Resources Management Plan 2024. Available at: <https://www.severntrent.com/content/dam/dwrmp-st-v2/STdWRMP24-HRA-Issue-2-redacted.pdf> [Date Accessed: 25/10/24].

³⁶ 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: 25/10/24].

Plans and Policies	Plan Status	Summary of housing/employment	Potential in-combination LSE
		monitoring and metering activities. An HRA was not available online.	

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: 25/10/24].

² Natural England (2014) Ensor's Pool SAC SIP. Available at: <http://publications.naturalengland.org.uk/publication/4607626272833536> [Date Accessed: 25/10/24].

³ Natural England (2019) Ensor's Pool SAC Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/publication/6577286383927296> [Date Accessed: 25/10/24].

⁴ Natural England (2018) Humber Estuary SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/5009545743040512> [Date Accessed: 25/10/24].

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

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

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)

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

⁶ Natural England (2015) Humber Estuary (SAC and SPA) SIP. Available at:
<http://publications.naturalengland.org.uk/file/5730884670980096> [Date Accessed: 25/10/24].

⁷ Natural England (2019) Humber Estuary SPA Conservation Objectives. Available at:
<http://publications.naturalengland.org.uk/publication/5382184353398784> [Date Accessed: 25/10/24].

A143 *Calidris canutus*; Red Knot (Non-breeding)
 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>)</p>

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

⁹ Natural England (2015) Humber Estuary SIP. Available at: <http://publications.naturalengland.org.uk/file/5730884670980096> [Date Accessed: 25/10/24].

¹⁰ JNCC (2007) Ramsar Information Sheet: Humber Estuary. Available at: <https://rsis.ramsar.org/RISapp/files/RISrep/GB663RIS.pdf> [Date Accessed: 25/10/24].

	<i>(Elymus repens)</i> saltmarsh 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 (*Lampetra fluviatilis*) and Sea Lamprey (*Petromyzon marinus*) between coastal waters and their spawning areas.

Threats and Pressures at European site which may be affected by the Local Plan:

- 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;

¹¹ Natural England (2018) River Mease SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/6640857448972288> [Date Accessed: 25/10/24].

- 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 *Ranunculion 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

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

¹² Natural England (2014) River Mease SAC SIP. Available at: <https://publications.naturalengland.org.uk/publication/6640857448972288> [Date Accessed: 25/10/24].

¹³ Natural England (2019) River Mease SAC Conservation Objectives Supplementary Advice. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030258.pdf> [Date Accessed: 25/10/24].

¹⁴ Natural England (2019) Severn Estuary SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6288530213175296> [Date Accessed: 25/10/24].

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.

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>

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: 25/10/24].

²⁰ Natural England (2012) Severn Estuary EMS Regulation 33 Conservation Advice Package. Available at: <http://publications.naturalengland.org.uk/publication/3184206> [Date Accessed: 25/10/24].

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 maritimae*); 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.

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.

²² Natural England (2019) Severn Estuary SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6377265718099968> [Date Accessed: 25/10/24].

²³ Natural England (2015) Severn Estuary (SPA and SAC) SIP. Available at: <http://publications.naturalengland.org.uk/publication/4590676519944192> [Date Accessed: 25/10/24].

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

²⁵ JNCC (2008) Ramsar Information Sheet: UK11081 Severn Estuary. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11081.pdf> [Date Accessed: 25/10/24].

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	This site is important for the run of migratory fish between sea and river via estuary. Species include: <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>); • Twaites Shad (<i>A. fallax</i>), and • Eel (<i>Anguilla Anguilla</i>). It is also of particular importance for migratory birds during spring and autumn.
5	Assemblages of international importance:
	Species with peak counts in winter:
	70919 waterfowl (5 year peak mean 1998/99-2002/2003)
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)
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 The fish of the whole estuarine and river system is one of the most diverse in Britain, with over 110 species recorded. Salmon (*Salmo salar*), Sea Trout (*S. trutta*), Sea Lamprey (*Petromyzon marinus*), River Lamprey (*Lampetra fluviatilis*), Allis Shad (*Alosa alosa*), Twaite Shad (*A. fallax*), and Eel (*Anguilla Anguilla*) use the Severn Estuary as a key migration route to their spawning grounds in the many tributaries that flow into the estuary. The site is important as a feeding and nursery ground for many fish species particularly Allis Shad (*Alosa alosa*) and Twaite Shad (*A. fallax*) which feed on mysid shrimps in the salt wedge.

Threats and Pressures at European site which may be affected by the Local Plan²⁶:

- 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: 25/10/24].

Appendix C: Screening evaluation of Preferred Options Regulation 18 Local Plan

The following section of **Appendix C** provides a screening evaluation of policies which comprise the Preferred Option Regulation 18 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). 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 12,978 new homes over the Plan period (2024-2045) (618 dwellings per year). It outlines the locations of this provision, totalling 13,901 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. 4.4ha of office floorspace and 275ha of B2 and B8 buildings over the Plan period. It outlines the locations of this provision, totalling approx. 123ha. 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 LSE 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 46 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 LSE at a number of European sites.	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 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

S7	Employment allocations	This policy outlines the approximate floorspace for each employment allocation and the principles for their development. 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 LSE at a number of European sites.	Category L	Screen In
S8	South West Rugby	This policy outlines the delivery of South West Rigby, a new neighbourhood of approx. 4,000 dwellings and 35ha of B8 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 LSE at a number of European sites.	Category L	Screen In
S9	South West Rugby spine road network	This policy outlines the delivery of a full spine 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 LSE at a number of European sites.	Category L	Screen In

Chapter 3: 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 4: 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

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
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 5: Centres

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
C1	Rugby town centre	This policy outlines the development up to 2041 in Rugby town centre, including the redevelopment of Rugby Central Shopping Centre and a new mixed-use hub. 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 LSE 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 6: 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	Ironstone Fringe Area of High Landscape Vale	This policy requires development located within the Ironstone Fringe landscape character area 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

Chapter 7: 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
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

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
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 9: 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
W3	Air quality	This policy sets out the requirements of development in terms of its impact on air quality in relation to human health and outlines mitigation measures. 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	Infil 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
I1	Transport	This policy sets out the provision of transport in line with the Warwickshire Local Transport Plan and prioritises active travel including cycling and walking infrastructure provision. It sets out the requirements of transport development.	Category F	Screen Out

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
		It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.		
I2	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
I3	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
I4	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
I5	New railway stations	This policy safeguards land to support the delivery of the proposed Nuneaton Parkway railway station. This policy supports the development of the new Rugby Parkway station. 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
I6	Secondary education	This policy allocates land for the provision of a new sixth form secondary school. It sets out the contribution of all new major residential developments in 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 L	Screen In

The Preferred Option Regulation 18 Local Plan sets out the following residential and employment allocation (see **Figure C.1**).

Rugby Local Plan Site Reference	Site Name	Residential or employment development?	Approximate residential dwellings / employment floorspace
6	Land east of Fosse Way opposite Knob Hill, Stretton-on-Dunsmore	Residential	3 dwellings
14	North of Antsy Park	Employment	75,000m ²
17	South West Rugby employment phase 2	Employment	130,000m ²
39	Dyers Lane, Wolston	Residential	15 dwellings
40	Land east of Kilsby Lane, Hillmorton, Rugby town	Residential	125 dwellings
41	Sandford Way, Dunchurch	Residential	122 dwellings
59	Newton Manor Lane, Brownsover, Rugby town	Residential	240 dwellings
62	Morgan Sindall House, Rugby town	Residential	90 dwellings
64	Coton Park east, Rugby	Employment	115,000m ²
75	Lea Crescent, Newbold on Avon	Residential	20 dwellings
81	Land west of Fosse Way, Stretton-on-Dunsmore	Residential	40 dwellings
84	Land south of Leicester Road, Wolvey	Residential	60 dwellings
87	Hillcrest Farm, Newton	Residential	25 dwellings
90	Homestead Farm, Coventry Road, Dunchurch	Residential	30 dwellings
95	Crowner Fields Farm and Home Farm, Hinckley Road, Antsy	Employment	18,000m ²
96	Land at Coventry Road, Wolvey	Residential	500 dwellings
100	Land at High Street, Ryton-on-Dunsmore	Residential	35 dwellings
102	Land south of Brownsover Road, Newbold on Avon	Residential	150 dwellings

Rugby Local Plan Site Reference	Site Name	Residential or employment development?	Approximate residential dwellings / employment floorspace
122	Fenley Fields (Old Laurentians), Cawston, Rugby town	Residential	125 dwellings
129	Land north of Lilbourne Road, Clifton upon Dunsmore	Residential	60 dwellings
134	Land north of Plott Lane, Stretton-on-Dunsmore	Residential	105 dwellings
202	Newton Road, Clifton upon Dunsmore	Residential	80 dwellings
307	North Road, Clifton upon Dunsmore	Residential	10 dwellings
309	Land north of B4109, Wolvey	Residential	150 dwellings
315	Land south of Rugby Road, Brinklow	Residential	340 dwellings
328	Prologis Park West and Mountpark, Ryton-on-Dunsmore	Employment	350,000m ²
332	Former Rugby Borough Council depot, Albert Street, Rugby town	Residential	25 dwellings
334	Land off Barby Lane, Hillmorton, Rugby town	Residential	400 dwellings
337	West Farm and Home Farm, Brinklow	Residential	90 dwellings
338	Land south of Crick Road, Houlton, Rugby town	Residential	250 dwellings

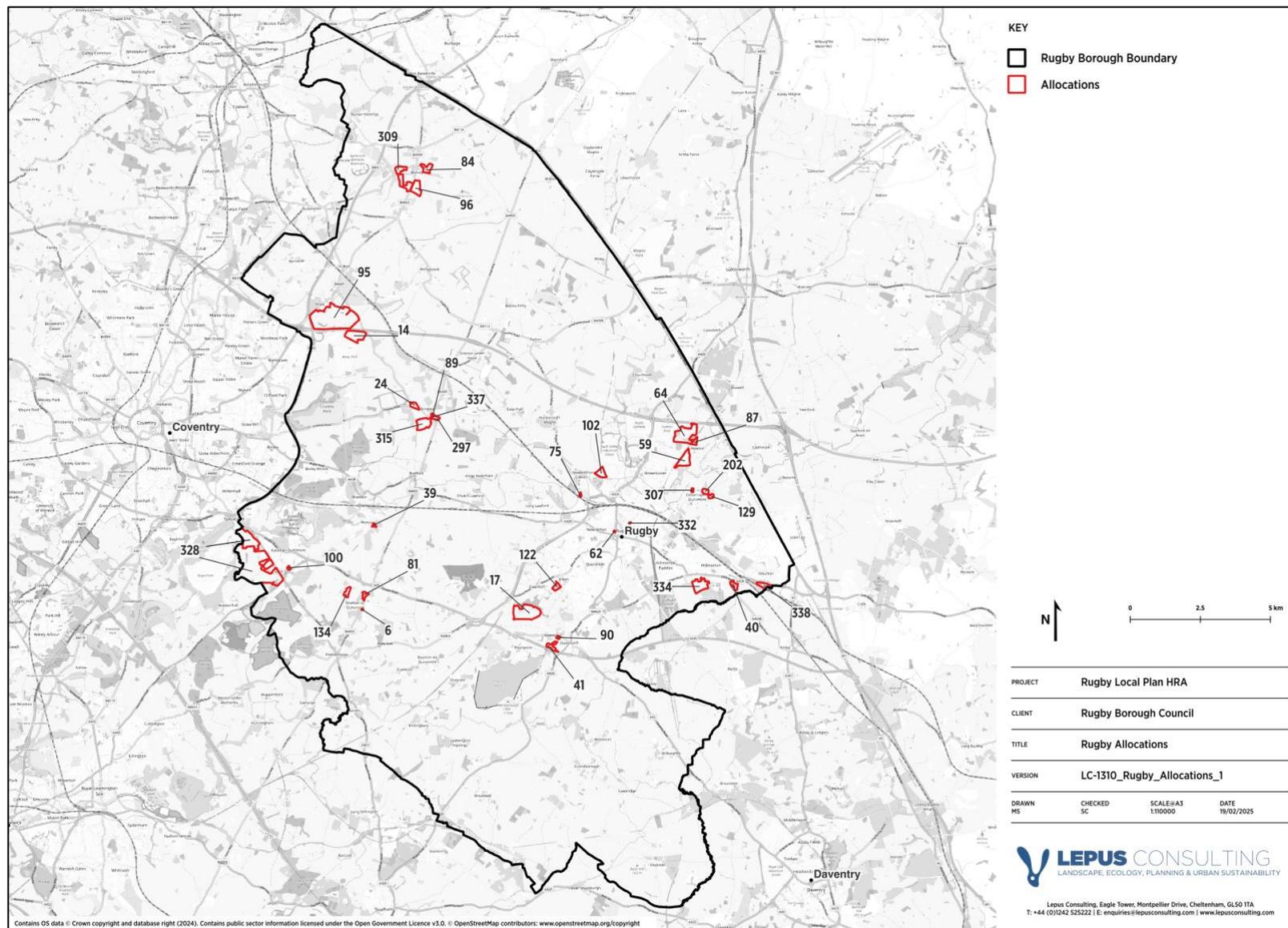


Figure C.1: Rugby residential and employment allocations

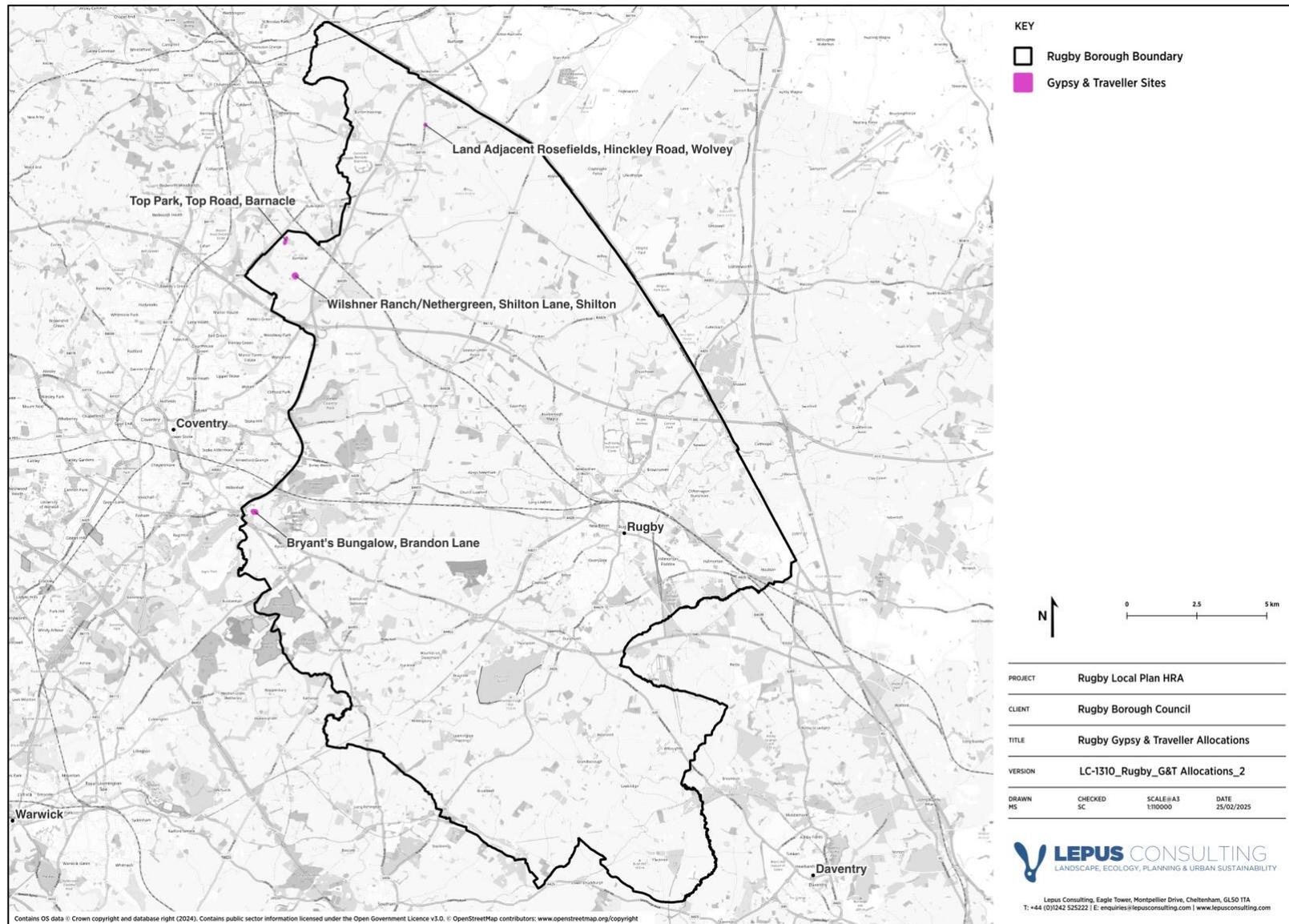


Figure C.2: Rugby Gypsy and Traveller allocations

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

Biodiversity Net Gain



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