

# Wolverhampton Issues and Preferred Options

## Habitats Regulations Assessment

January 2024



**LEPUS** CONSULTING  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

# Habitats Regulations Assessment of the Wolverhampton Local Plan

Regulation 18

Issues and Preferred Options Consultation

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# Acronyms & abbreviations

<b>AA</b>	Appropriate Assessment
<b>AADT</b>	Annual Average Daily Traffic
<b>AAP</b>	Area Action Plans
<b>ALS</b>	Abstraction License Strategy
<b>APIS</b>	Air Pollution Information System
<b>BCCS</b>	Black County Core Strategy
<b>BCP</b>	Black Country Plan
<b>CJEU</b>	Court of Justice of the European Union
<b>CWC</b>	City of Wolverhampton Council
<b>DfT</b>	Department for Transport
<b>DMRB</b>	Design Manual for Roads and Bridges
<b>DTA</b>	David Tyldesley and Associates
<b>EA</b>	Environmental Agency
<b>HDV</b>	Heavy Duty Vehicle
<b>HRA</b>	Habitats Regulations Assessment
<b>IUCN</b>	International Union for Conservation of Nature
<b>JNCC</b>	Joint Nature Conservation Committee
<b>LNR</b>	Local Nature Reserve
<b>LPA</b>	Local Planning Authority
<b>LSE</b>	Likely Significant Effect
<b>MOU</b>	Memorandum of Understanding
<b>PEBR</b>	Planning Evidence Base Review
<b>PRoW</b>	Public Right of Way
<b>SAC</b>	Special Area of Conservation
<b>SAMMM</b>	Strategic Access Management and Monitoring Measures
<b>SIP</b>	Site Improvement Plan
<b>SPA</b>	Special Protection Area
<b>SSSI</b>	Site of Special Scientific Interest
<b>WFD</b>	Water Framework Directive
<b>WLP</b>	Wolverhampton Local Plan
<b>WwTW</b>	Water Waste Treatment Works
<b>ZOI</b>	Zone of Influence

# 1 Introduction

## 1.1 Local Plan overview

1.1.1 The City of Wolverhampton Council (CWC) is working to produce a new Wolverhampton Local Plan (WLP). **Figure 1.1** shows the administrative boundary of Wolverhampton, which comprises the Plan area for the WLP.

1.1.2 When adopted, the WLP will replace:

- The Black Country Core Strategy for the Wolverhampton area<sup>1</sup>
- Parts of Stafford Road Corridor AAP<sup>2</sup> / Bilston Corridor Area Action Plan<sup>3</sup> / Wolverhampton City Centre AAP<sup>4</sup> / UDP (2006)<sup>5</sup>

1.1.3 The Black Country Core Strategy (BCCS) was produced by the four Black Country authorities of Dudley, Sandwell, Walsall and Wolverhampton and covered the period up to 2026. The BCCS provided the strategic framework for the three Area Action Plans (AAP) in Wolverhampton, which set out local policies and site allocations for the parts of Wolverhampton where regeneration and growth is concentrated. The four authorities began a review of the BCCS in 2016, to roll forward the Plan and address changes that had taken place since 2011. This review was supported by a detailed evidence base. In autumn 2022 the authorities decided not to take forward the BCP review and instead pursue separate strategic plans and progress differing approaches to site allocations to meet identified needs. The evidence collated as part of the BCP review, draft BCP policies and responses to consultation on these remains relevant to the WLP.

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<sup>1</sup> Wolverhampton City Council, Walsall Council, Sandwell Metropolitan Borough Council and Dudley Metropolitan Borough Council (2011) Black Country Core Strategy Adopted February 2011. Available at: <https://www.wolverhampton.gov.uk/planning/planning-policies/black-country-core-strategy> [Date accessed: 27/11/23].

<sup>2</sup> Wolverhampton City Council (2014) Stafford Road Corridor Area Action Plan 2013 – 2026. Available at: [https://www.wolverhampton.gov.uk/sites/default/files/2022-02/stafford\\_road\\_corridor\\_aap\\_adopted\\_version\\_0.pdf](https://www.wolverhampton.gov.uk/sites/default/files/2022-02/stafford_road_corridor_aap_adopted_version_0.pdf) [Date accessed: 21/11/23].

<sup>3</sup> Wolverhampton City Council (2014) Bilston Corridor Area Action Plan including Bilston Neighbourhood Plan 2013 – 2026. Available at: [https://www.wolverhampton.gov.uk/sites/default/files/2022-02/bilston\\_corridor\\_aap\\_adopted\\_version\\_0.pdf](https://www.wolverhampton.gov.uk/sites/default/files/2022-02/bilston_corridor_aap_adopted_version_0.pdf) [Date accessed: 21/11/23].

<sup>4</sup> Wolverhampton City Council (2016) Wolverhampton City Centre Area Action Plan 2015 - 2026. Available at: [https://www.wolverhampton.gov.uk/sites/default/files/2022-02/wolverhampton\\_city\\_centre\\_area\\_action\\_plan\\_adopted\\_version\\_0.pdf](https://www.wolverhampton.gov.uk/sites/default/files/2022-02/wolverhampton_city_centre_area_action_plan_adopted_version_0.pdf) [Date accessed: 21/11/23].

<sup>5</sup> Wolverhampton City Council (2006) Wolverhampton Unitary Development Plan. Available at: [https://www.wolverhampton.gov.uk/sites/default/files/2019-03/udp\\_june\\_2006.pdf](https://www.wolverhampton.gov.uk/sites/default/files/2019-03/udp_june_2006.pdf) [Date accessed: 21/11/23].

1.1.4 The WLP is being prepared in the context of national and local guidance and strategies and has drawn on an evidence base to justify the spatial strategy and draft policies proposed within the Plan. The current version of the Issues and Preferred Options Consultation comprises the vision and strategic priorities, spatial strategy, policies and site allocations. Given the volume of work undertaken as part of the BCP review, this document also seeks consultation on preferred options for the WLP. Lepus Consulting has prepared this report to inform the Habitats Regulations Assessment (HRA) of the Issues and Preferred Options Consultation version of the WLP at Regulation 18 on behalf of the Council.

## 1.2 Purpose of this report

1.2.1 HRA is an iterative process, designed to run alongside and inform the plan making process to ensure adverse impacts on habitats sites are avoided in the first instance through strategic planning of options or, where this is not possible, effective mitigation which is designed to ensure no adverse impact on site integrity.

1.2.2 The purpose of this HRA is to inform the development of the WLP at the Regulation 18 stage of the plan making process. It provides a screening of allocations and policies which comprise the Issues and Preferred Options consultation exercise. It also sets out further stages of HRA work that will be required at future stages of the Plan's development.

1.2.3 This HRA report has been prepared in accordance with the Habitats Regulations and has been informed by the following guidance:

- Planning Practice Guidance: Appropriate Assessment<sup>6</sup>
- The Habitat Regulations Assessment Handbook - David Tyldesley and Associates (referred to hereafter as the DTA Handbook), 2013 (in particular Part F: 'Practical Guidance for the Assessment of Plans under the Regulations').

## 1.3 Habitats Regulations Assessment

1.3.1 The application of HRA to land-use plans is a requirement of the Conservation of Habitats and Species Regulations 2017 (as amended)<sup>7</sup>. HRA applies to plans and projects, including all Local Development Documents in England and Wales.

1.3.2 Where a plan is likely to have a significant effect on a habitats site (either alone or in-combination) and is not directly connected with or necessary to the management of the habitats site, Regulation 105 of the Habitats Regulations notes that 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 HRA.

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<sup>6</sup> Ministry of Housing, Communities and Local Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment.

<sup>7</sup> The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date accessed: 01/11/23] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Date accessed: 13/11/23].

1.3.3 The Habitats Regulations<sup>8</sup> 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 site<sup>9</sup>. European sites together with sites set out in national policy (listed below) are referred to in England and Wales as a habitats site<sup>10</sup>.

- 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 habitats sites, pSPA, pSAC and listed or proposed Ramsar sites.

1.3.4 No HRA work has been undertaken to date in support of the WLP review. The Draft BCP consultation was however accompanied by an HRA which included a preliminary screening and made recommendations to inform policy wording<sup>11</sup>. It concluded potential Likely Significant Effects (LSEs) at a number of habitats sites from air quality, hydrology, public access and disturbance and habitat loss / fragmentation impact pathways. This provides useful baseline information for this HRA.

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<sup>8</sup> 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> [Date accessed 07/09/23] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Date accessed: 13/11/23].

<sup>9</sup> Ministry of Housing, Communities & Local Government (2023). National Planning Policy Framework. Para 181. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1182995/NPPF\\_Sept\\_23.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.pdf) [Date accessed: 13/11/23].

<sup>10</sup> Habitats site: Any site which would be included within the definition at Regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites. Ministry of Housing, Communities & Local Government (2021). National Planning Policy Framework. Para 181. Available in Annex 2 (Glossary) at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1182995/NPPF\\_Sept\\_23.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.pdf) [Date accessed: 13/11/23].

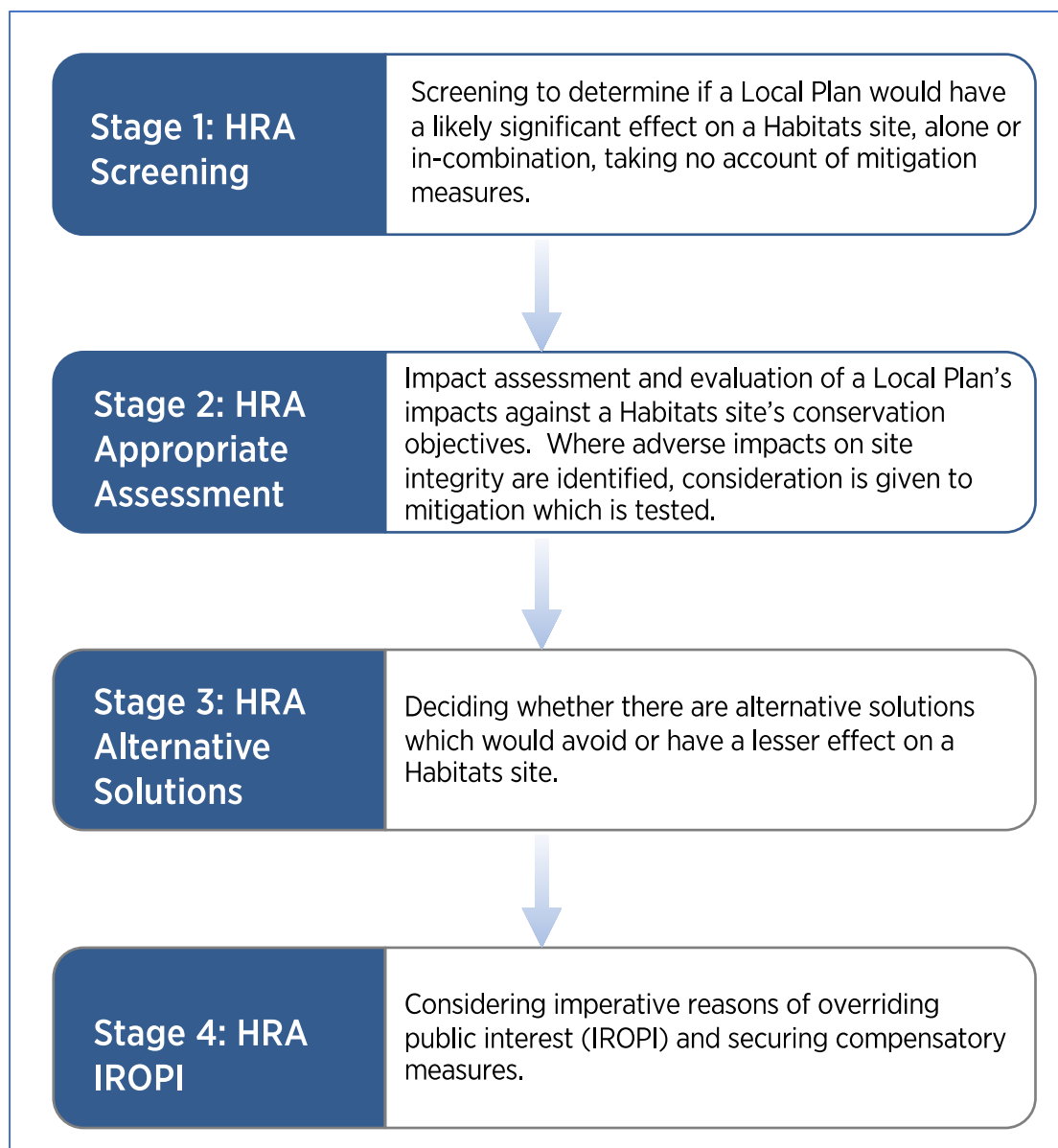
<sup>11</sup> Lepus Consulting. July 2021. Habitats Regulations Assessment of the Black Country Plan. Interim HRA to support the plan making process. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date accessed: 27/11/23].



## 2 Methodology

### 2.1 Overview

2.1.1 HRA is a rigorous precautionary process centred around the conservation objectives of a habitat site's qualifying interests. It is intended to ensure that habitats 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.



**Figure 2.1:** Stages in the Habitats Regulations Assessment process<sup>12</sup>

<sup>12</sup> Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (October) (2018) edition UK: DTA Publications Limited. Available at: [www.dtapublications.co.uk](http://www.dtapublications.co.uk) [Date accessed: 13/11/23].

## 2.2 Stage 1: Screening for Likely Significant Effects

- 2.2.1 The first stage in the HRA process comprises the screening stage. 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 habitats 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 LSEs at a habitats site, either alone or in-combination with other plans or projects.
- 2.2.2 Where elements of the WLP will not result in an LSE on a habitats site (alone or in-combination) these are screened out and are not considered in further detail in the process. Where LSEs are identified, the HRA process moves to an Appropriate Assessment of LSEs (Stage 2).
- 2.2.3 Evaluation codes have been used to summarise whether or not each component of the Local Plan is likely to have LSEs alone or in-combination. These codes are subsequently used to inform the formal screening decision (**Column 2, Table 2.1**). The results are presented in **Chapter 4** of this report.

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

Screening evaluation and reasoning categories from Chapter F of The Habitats Regulations Assessment Handbook (DTA Publications, 2013):	Screen in / 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

- 2.2.4 Where components of the WLP have no LSE alone, the screening assessment next considers potential in-combination LSEs. Plans and projects which are considered to be of most relevance to the in-combination assessment of the WLP include those that have similar impact pathways (see **Appendix A**). 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 which may act in-combination with the WLP, such as transport, waste and mineral plans and projects, have also been taken into consideration. Plans which allocate water resources or are likely to influence water quality in the study area have been considered. Finally, neighbouring authority local plans which may increase development related public access and disturbance pressures at habitats sites have also been considered. The in-combination assessment is compliant with the Wealden Judgement<sup>13</sup>.
- 2.2.5 The European Court Judgement on the interpretation of the Habitats Directive in the case of People Over Wind and Sweetman vs Coillte Teoranta (Case C-323/17<sup>14</sup>) determined that mitigation measures are only permitted to be considered as part of an Appropriate Assessment. 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 habitats site when assessing the LSE of the WLP on habitats sites. These are measures, which if removed (i.e. should they no longer be required for the benefit of a habitats site), would still allow the lawful and practical implementation of a plan.

## 2.3 Stage 2: Appropriate Assessment and Integrity Test

- 2.3.1 Stage 2 of the HRA process comprises the Appropriate Assessment and Integrity Test. The purpose of the AA (as defined by the DTA Handbook) is to “undertake an objective, scientific assessment of the implications for the European site qualifying features potentially affected by the Plan in light of their consideration objectives and other information for assessment”<sup>15</sup>.
- 2.3.2 The Appropriate Assessment is undertaken in view of individual habitats site’s conservation objectives. As part of this process decision 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 such as through the adoption of mitigation measures. Mitigation measures should aim to avoid, minimise or reduce significant effects on habitats sites. Mitigation measures may take the form of policies within the WLP, or mitigation proposed through other plans or regulatory mechanisms. All mitigation measures must be deliverable and able to mitigate adverse effects for which they are targeted.

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<sup>13</sup> Wealden District Council & Lewes District Council before Mr Justice Jay. Available at: <http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html> [Date accessed: 06/11/23].

<sup>14</sup> InfoCuria (2018) Case C-323/17. Available at: <http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN> [Date accessed: 06/11/23].

<sup>15</sup> Tyldesley, D. (2013) The Habitats Regulations Assessment Handbook. DTA Publications.

- 2.3.3 The Appropriate Assessment aims to present information in respect of all aspects of the WLP and ways in which it could, either alone or in-combination with other plans and projects, impact a habitats site.
- 2.3.4 The plan making body (as the Competent Authority) must then ascertain, based on the findings of the Appropriate Assessment, whether the WLP will adversely affect the integrity of a habitats site either alone or in-combination with other plans and projects. This is referred to as the Integrity Test.
- 2.3.5 Whilst this report does not provide a full Appropriate Assessment, it sets out information that is required to inform the Appropriate Assessment as the WLP develops in order to allow the Integrity Test to be made.

## 2.4 Dealing with uncertainty

- 2.4.1 Uncertainty is an inherent characteristic of an HRA and decisions can be made only using currently available and relevant information. This concept is reinforced by the 7<sup>th</sup> of September 2004 'Waddenzee' ruling<sup>16</sup>:
- 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 Appropriate Assessment. The conclusion of this assessment is, of necessity, subjective in nature. Therefore, the competent authorities can, from their point of view, be certain that there will be no adverse effects even though, from an objective point of view, there is no absolute certainty."*

## 2.5 The Precautionary Principle

- 2.5.1 The HRA process is characterised by the Precautionary Principle: *"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."*
- 2.5.2 The Precautionary Principle is embedded in the Integrity Test.

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

## 3 Scoping of threats and pressures at habitats sites

### 3.1 Introduction

3.1.1 An important initial stage of the screening process is gathering information on habitats sites which may be affected by the WLP. This is informally known as scoping and provides an understanding of potential impact pathways from the WLP and connections to habitats sites and their vulnerabilities. This information is then used to inform the screening assessment (**Chapter 4**). This chapter therefore scopes habitats sites and their associated threats and pressures in the context of the WLP.

### 3.2 Identification of an HRA study area

3.2.1 Each habitats site has its own intrinsic qualities, besides the habitats or species for which it has been designated, that enables the site to support various 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), the pollution / threat a development generates (air pollution or increased recreational pressure), and the resources used (during construction and operation for instance).

3.2.2 An intrinsic quality of any habitats site is its functionality at the landscape ecology scale. This refers to how the site interacts with the Zone of Influence (ZOI) of its immediate surroundings, as well as the wider area. This is particularly the case where there is potential for developments resulting from the 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, but which are qualifying features of the site. For example, there may be effects on protected birds that use land outside the designated site for foraging, feeding, roosting or other activities.

3.2.3 There is no guidance that defines the study area for inclusion in HRA. Planning Practice Guidance for Appropriate Assessment (listed above) indicates that:

3.2.4 *"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".*

### 3.3 Scoping impact pathways

3.3.1 Threats and pressures to which habitats sites are vulnerable have been identified through reference to data held by the JNCC and Natural England on Natura 2000 Data Forms, Ramsar Information Sheets and Site Improvement Plans (SIPs). This information provides current and predicted issues at each habitats site and is summarised in **Appendix B**.

3.3.2 Supplementary advice notices prepared by Natural England provide more recent information on threats and pressures upon habitats sites than SIPs and have therefore also been reviewed. A number of threats and pressures are unlikely to be exacerbated by the WLP.

3.3.3 Based on a review of the Draft BCP HRA (2021), neighbouring LPA HRAs and local knowledge, the following potential impact pathways are considered to be within the scope of influence of the WLP. This includes consideration of potential impacts upon both designated sites and areas of functionally linked habitat outside their designation boundary.

- **Air pollution:** Land use planning has the potential to increase atmospheric emissions of pollutants to the air. These can result in adverse effects at habitats sites such as eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)<sup>17</sup>.
- **Water resources and water levels:** Urban development can change run off rates from urbanised areas to habitats 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 outside a designated site boundary).
- **Recreational pressure:** Increased development has the potential to increase recreational pressure upon habitats sites which are accessible to the public.
- **Urbanisation effects:** Urban development has the potential to result in disturbing activities (such as noise, lighting and visual disturbance). Disturbance effects may impact upon habitats sites themselves and also their qualifying features when outside a designated site boundary.

## 3.4 Air quality

3.4.1 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<sup>18</sup>. This guidance sets a methodology and thresholds for screening of Likely Significant (air quality) Effects at the HRA screening stage (Stage 1 of the HRA process).

3.4.2 At this stage in the plan making process, traffic modelling data was not available to allow the application of screening thresholds. However, Natural England's guidance (in the form of a series of questions / thresholds below) has been applied to determine potential air quality impact pathways to habitats sites:

<sup>17</sup> APIS (2016) Ecosystem Services and air pollution impacts. Available at: <http://www.apis.ac.uk/ecosystem-services-and-air-pollution-impacts> [Date accessed: 12/11/23].

<sup>18</sup> 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: 12/11/23].

- Does the WLP give rise to emissions which are likely to reach a habitats 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 habitats site i.e. application of a 10km radius?**

3.4.3 The WLP will trigger housing and employment development and as such increase traffic related emissions. Air quality impacts have been shown to typically affect habitats sites within 10km of a plan boundary<sup>19</sup>. 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'*<sup>20</sup>. The following habitats sites are located within 10km of the WLP boundary.

- Fens Pools SAC
- Cannock Extension Canal SAC

3.4.4 Wolverhampton City Council, Dudley, Walsall, Sandwell and Staffordshire Councils are working together to prepare a joint strategic air pollution evidence base to support local plan production in their respective local authority areas. The research includes the following habitats sites:

- Cannock Chase SAC
- Pasturefields Salt Marsh SAC
- West Midlands Mosses SAC
- Midlands Meres and Mosses Phase 1 Ramsar Site
- Midlands Meres and Mosses Phase 2 Ramsar Site
- Motte Meadows SAC
- Cannock Extension Canal SAC
- Fens Pools SAC

3.4.5 Whilst only Fens Pools SAC and Cannock Extension Canal SAC are located within 10km of the WLP boundary, the outcomes / evidence generated by the joint strategic air quality research project will be considered as necessary in the HRA process.

<sup>19</sup> Chapman, C and Kite, B. 2021. Main Report. Guidance on Decision-making Thresholds for Air Pollution. JNCC Report No. 696. Available at: <https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447> [Date accessed: 12/11/23].

<sup>20</sup> JNCC. Nitrogen Future. <https://jncc.gov.uk/our-work/nitrogen-futures/> [Date accessed: 12/11/23].

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

- 3.4.6 It is widely accepted that air quality impacts are greatest within 200m of a road source, decreasing with distance<sup>21,22,23</sup>. Baseline mapping data has been used to determine the proximity of habitats sites, and their qualifying features, to roads (within 200m) which may result in an exceedance of Natural England's screening thresholds (A and B roads) within a 10km buffer from the WLP administrative area<sup>24</sup>. The UK Air Pollution Information System (APIS) provides information on all habitats 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 WLP to any habitats site through a change in atmospheric emissions (Table 3.1). Based on a review of aerial mapping data and priority habitat information it is concluded that qualifying features of Fens Pools SAC and Cannock Extension Canal may be located within 200m of an A or B road. This information suggests that both of these locations are sensitive to changes in air quality in particular from atmospheric nitrogen deposition (all qualifying features).

**Could the sensitive qualifying features of the site be exposed to emissions?**

- 3.4.7 As noted above, the WLP will trigger housing and employment development and as such has the potential to increase traffic related emissions within 10km of the WLP area and therefore along road links within 200m of habitat sites listed in Table 3.1.

**Application of screening thresholds (alone and then if necessary in combination)**

- 3.4.8 Natural England's advice on the assessment of air quality impacts under the Habitats Regulations states that consideration should be given to the risk of road traffic emissions associated with a Local Plan<sup>25</sup>. This advice states that an assessment of the risks from road traffic emissions can be expressed in terms of the average annual daily traffic flow (AADT as a proxy for emissions). The use of the AADT screening threshold is advocated by Highways England in their Design Manual for Roads and Bridges (DMRB). This screening threshold is intended to be used as a guide to determine whether a more detailed assessment of the impact of emissions from road traffic is required. This non-statutory or guideline threshold is based on a predicted change of daily traffic flows of 1,000 AADT or more (or heavy-duty vehicle flows on motorways (HDV) change by 200 AADT or more).

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<sup>21</sup> 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.

<sup>22</sup> Natural England (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report NECR 199.

<sup>23</sup> Bignal, K., Ashmore, M. & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

<sup>24</sup> As per Nitrogen Futures Modelling Work – see Paragraph 5.4.8.

<sup>25</sup> 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: 14/11/23].



- 3.4.9 The AADT thresholds do not themselves imply any intrinsic environmental effects and are used solely as a trigger for further investigation. Widely accepted environmental benchmarks for imperceptible impacts are set at 1% of the critical load or level, which is considered to be roughly equivalent to DMRB thresholds for changes in traffic flow of 1,000 AADT and for HDV of 200 AADT. This has been confirmed by modelling using the DMRB Screening Tool that used average traffic flow and speed figures from the Department for Transport (DfT) data to calculate whether the NO<sub>x</sub> outputs could result in a change of >1% of critical load / level on different road types. A change of >1,000 AADT on a road was found to equate to a change in traffic flow which might increase emissions by 1% of the Critical Load or Level and might consequentially result in an environmental effect nearby (e.g. within 10 metres of roadside).
- 3.4.10 The AADT thresholds and 1% of critical load/level are considered by Natural England to be suitably precautionary as any emissions below this level are widely considered to be imperceptible and, in the case of AADT, undetectable through the DMRB model. There can, therefore, be a high degree of confidence in its application to screen for risks of an effect.
- 3.4.11 Traffic modelling data was not available at the time of writing and as such Natural England's screening thresholds have not been applied as part of this screening exercise.
- 3.4.12 To ensure a precautionary approach at this stage of the HRA process, air quality LSEs at habitats sites set out in **Table 3.1** are scoped in for further consideration in the HRA process. Outputs from the joint strategic air pollution evidence base (**paragraph 3.4.4**) will be drawn upon when available to inform air quality work at the Appropriate Assessment stage of the HRA.

**Table 3.1:** Atmospheric pollution impact pathways to habitats sites within 10km of the WLP boundary

Habitats site within 10km radius of Plan area	Is the habitats site sensitive to air quality impacts (as indicated in SIP / NE Supplementary Conservation Advice – Appendix B)?	Is there a strategic road link (A and B roads) located within 200m of the habitats site?	Will the habitats site be scoped in for further assessment in the HRA process?
Cannock Extension Canal SAC	Yes	A5, M6 toll (junction for services only), B4154	Yes
Fens Pools SAC	Yes	A4101, and A461	Yes

### **3.5 Water quality and water quantity**

- 3.5.1 As illustrated in Figure 3.1 the WLP area is located within the Severn River Basin District, and the Humber River Basin District.
- 3.5.2 In the Severn River Basin District, the WLP area coincides with the Severn Middle Worcestershire management catchment. The Smestow Brook drains the south-western section of the Plan area, joining the River Stour (which is a tributary of the River Severn) to the north of Stourton. The River Severn flows in a south westerly direction to the Severn Estuary which is designated as a SAC, SPA and Ramsar for a number of qualifying features (**Appendix B**).
- 3.5.3 In the Humber River Basin District, the WLP area coincides with both the Tame, Anker and Mease and Trent Valley Staffordshire surface water management catchments. The River Tame flows outside but adjacent to the western edge of the Plan boundary with tributaries of this river draining the Plan area itself. The River Tame is a tributary of the River Trent which flows in a northerly direction, joining the Humber Estuary to the west of Hull. The Humber Estuary is designated as a SAC, SPA and Ramsar for a number of qualifying features (**Appendix B**).
- 3.5.4 An extensive canal network is located within and around the WLP area. The Birmingham Canal passes through the centre of Wolverhampton with the Wyrley and Essington Canal passing through the west of Wolverhampton. The Staffordshire and Worcester canal runs in a north-east to south-west direction through the Plan area and is joined from the north-west by the Shropshire Union Canal.

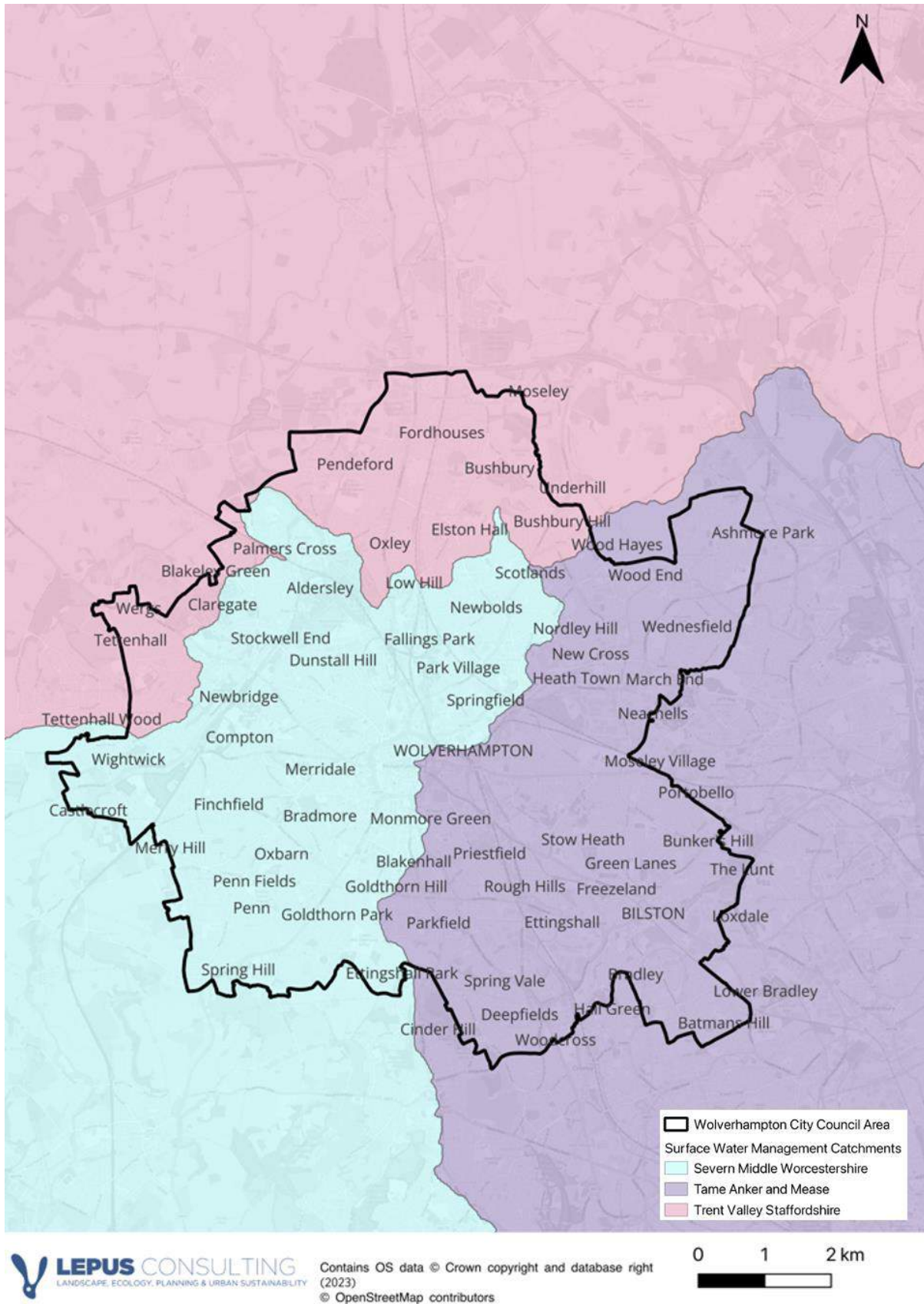


Figure 3.1: Surface Water Management Catchment

- 3.5.5 Urban development coming forward through the WLP has the ability to affect water dependant habitats 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 habitats sites:
- Change in surface permeability and run off rates;
  - Increased water demand to supply new homes and businesses;
  - Reduce quality of surface run off water; and
  - Increased effluent discharge for treatment from Wastewater Treatment Works (WwTWs).
- 3.5.6 Decisions relating to water abstraction for supply and disposal of water are controlled through a number of licencing 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 Water Framework Directive (WFD).
- 3.5.7 There are no habitats sites located within the Plan boundary. Habitats sites outside the Plan area can be affected by changes in water supply and quality where they are hydrologically linked to development in the WLP. A review of desk-based information indicates that there are hydrological links between the Plan area and Fens Pools SAC, River Mease SAC, Ensor’s Pool SAC, Cannock Chase SAC, Cannock Extension Canal SAC, West Midland Mosses Species Are of Conservation SAC (Chartley Moss SSSI), Motte Meadows SAC and Pasturefields Salt Marsh SAC due their location within the Worcestershire Middle Severn Abstraction Licence Strategy (ALS) area, the Tame, Anker and Mease ALS and Staffordshire Trent Valley ALS (see **Table 3.2**). As such, the WLP is considered likely to have a potentially significant water quantity effect upon these designations and as such, they are scoped into this assessment for further

**Table 3.2:** Hydrologically sensitive habitats sites within ALS catchment areas consideration in the HRA process

ALS catchment	Hydrologically sensitive habitats sites within ALS catchment
Worcestershire Middle Severn ALS <sup>26</sup>	Fens Pools SAC
Tame, Anker and Mease ALS <sup>27</sup>	River Mease SAC Ensor’s Pool SAC

<sup>26</sup> Environmental Agency (2022) Worcestershire Middle Severn Abstraction Licensing Strategy. Available at: <https://www.gov.uk/government/publications/cams-worcestershire-middle-severn-abstraction-licensing-strategy> [Date accessed: 13/11/23].

<sup>27</sup> Environmental Agency (2022) Tame, Anker and Mease Abstraction Licensing Strategy. Available at: <https://www.gov.uk/government/publications/cams-tame-anker-and-mease-abstraction-licensing-strategy> [Date accessed: 13/11/23].

ALS catchment	Hydrologically sensitive habitats sites within ALS catchment
Staffordshire Trent Valley ALS <sup>28</sup>	Cannock Chase SAC Cannock Extension Canal SAC West Midland Mosses Special Area of Conservation SAC (Chartley Moss SSSI) Motte Meadows SAC Pasturefields Salt Marsh SAC

- 3.5.8 Land use planning has the potential to result in impacts upon qualifying features (for instance mobile species of fish or birds) when located outside a designation boundary, known as functionally linked habitat.
- 3.5.9 The term 'functional linkage' is defined by Natural England as "the role or 'function' that land or sea beyond the boundary of a habitats 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 habitats site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status"<sup>29</sup>.
- 3.5.10 In addition to direct loss or degradation of habitat (designated or functionally linked), development has the potential to result in the fragmentation of habitats through the loss of connecting corridors which would hinder the movement of mobile qualifying species which are associated with some designations.
- 3.5.11 The tests set out under Article 105 of the Habitats Regulations need to be applied in respect of plans which may significantly affect functionally linked habitat that plays an important role in contributing to the favourable conservation status of the relevant species for which a habitats site is designated.
- 3.5.12 The CJEU ruling in the Holohan case confirmed that habitats and / or species which are located outside of a designated site, if they are necessary to the conservation of the habitat types and species listed for the protected area, must be considered in an Appropriate Assessment.
- 3.5.13 A detailed desk study has been undertaken as part of the HRA screening process to identify pathways and connections to areas of functionally linked land and watercourses which may be affected by the WLP. This has drawn on Natural England designated site and SSSI IRZ data, International Union for Conservation of Nature (IUCN) data, magic, priority habitat inventory data and aerial photography.
- 3.5.14 As noted, the WLP area predominantly falls within hydrological catchments associated with the Severn Estuary and the Humber Estuary.

<sup>28</sup> Environmental Agency (2022) Staffordshire Trent Valley Abstraction Licensing Strategy. Available at: <https://www.gov.uk/government/publications/cams-staffordshire-trent-valley-abstraction-licensing-strategy> [Date Accessed:13/11/23].

<sup>29</sup> 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.

- 3.5.15 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 the estuary, including the SAC species (listed earlier) and additionally species of salmon (*Salmo salar*), sea trout (*S. trutta*) and allis shad (*Alosa alosa*).
- 3.5.16 Consultation with the Environment Agency (EA) indicates that recent surveys have identified fish spawning sites along the whole length of the River Severn (where access is possible) and within the River Teme. Fish have been recorded from Maisemore Weir in Gloucester all the way up to Lincombe Wier near Stourport and in the River Teme from its mouth with the Severn to upstream of Knightwick and as far as Tenbury<sup>30</sup>.
- 3.5.17 The 'Unlocking the Severn' project<sup>31</sup>, which is run in partnership between the Canal and Rivers Trust, the Severn Rivers Trust, the Environment Agency (EA) and Natural England, aims to create fish passes at six barriers on the Severn and its River Teme tributary to allow twaite shad to migrate upstream. With the opening of the Diglis fish pass in March 2021 fish are now able to move upstream through Worcester to Stourport on Severn. A consultation response from Natural England indicates that currently, the tidal weir at Tewkesbury is believed to present an obstacle to most of the migratory fish species apart from the European eel, which has been recorded in the Warwickshire Avon. Natural England note that in the last few decades eel numbers have declined internationally by as much as 95% and have been listed by the International Union for Conservation of Nature (IUCN) on their Red List as critically endangered species<sup>32</sup>. Barriers to their journey upstream and degradation of habitat and pollution are some of the contributing factors for the decline. Whilst there are still barriers to upstream movement, any development within the upper catchment (and WLP area) must ensure potential future use of these sites are not compromised.
- 3.5.18 Migratory fish species associated with the Humber Estuary SAC and the Humber Estuary Ramsar are sea lamprey and river lamprey. River lamprey have been recorded as far upstream as the River Dove (on the Staffordshire/Derbyshire border).

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<sup>30</sup> Unlocking the Severn (2022) Endangered twaite shad fish return to habitat unlocked after 180 years. Available at: <https://www.unlockingthesevern.co.uk/endangered-fish-return-to-habitat-unlocked-after-180-years/> [Date accessed: 14/11/23].

<sup>31</sup> Rivers and Canals Trust (2023) Unlocking the Seven Project Available at: [https://canalrivertrust.org.uk/enjoy-the-waterways/canal-and-river-network/river-severn-navigation/unlocking-the-severn?gclid=EAlaIQobChMIsevp7MLd8QIVysLtCh3-VwefEAAYASAAEgLC4vD\\_BwE](https://canalrivertrust.org.uk/enjoy-the-waterways/canal-and-river-network/river-severn-navigation/unlocking-the-severn?gclid=EAlaIQobChMIsevp7MLd8QIVysLtCh3-VwefEAAYASAAEgLC4vD_BwE) [Date accessed: 14/11/23].

<sup>32</sup> IUCN Red List (2018) European Eel. Available at: <https://www.iucnredlist.org/species/60344/152845178> [Date accessed: 14/11/23].

- 3.5.19 Any potential deterioration in water quality or habitat outside the Severn Estuary and Humber Estuary SAC and Ramsar designations as a result of the WLP may have implications for the migration of fish to upstream spawning habitat if it results in a barrier to movement. The impact of the WLP 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 watercourses<sup>33</sup>.
- 3.5.20 Taking into consideration potential changes in water levels (through abstraction for water supply), water quality (through surface water run-off and discharges from WwTWs) and impacts upon functionally linked watercourses, habitats sites were screened for potential hydrological impact pathways. **Table 3.3** indicates which habitats sites will be scoped into the screening assessment for further consideration in the HRA process in terms of hydrological impact pathways.
- 3.5.21 Cannock Chase SAC has been noted to be sensitive to hydrological impact<sup>34</sup>. Cannock Chase SAC is not located within the WLP area. As set out in Natural England's Supplementary Advice, the SAC depends upon water supply, and poor water quality and quantities can adversely affect the structure and function of the habitat type. Both the SAC and the Plan area are located within the Trent Valley Staffordshire surface water management catchment. However, the SAC and Plan area are not hydrologically connected via surface water features and therefore water quality impacts from development in WLP are unlikely.
- 3.5.22 The SAC and the Plan area are both located in the Staffordshire Trent Valley ALS area. As such the SAC will be considered further in the HRA process in terms of water supply / abstraction impacts from the WLP. Therefore, the habitat site will be scoped for further assessment in the HRA process.
- 3.5.23 Cannock Extension Canal SAC has been noted to be sensitive to hydrological impact<sup>35</sup>. Cannock Extension Canal SAC and Plan area are both located within the Trent Valley Staffordshire surface water management catchment. The WLP area feeds into River Tame which joins the River Trent downstream of the SAC, and therefore there are no hydrological links to the Plan area and water quality effects are considered to be unlikely.

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<sup>33</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/307788/river-basin-planning-standards.pdf) [Date accessed: 14/11/23].

<sup>34</sup> Natural England (2014) Cannock Chase SAC SIP. Available at: <http://publications.naturalengland.org.uk/publication/4957799888977920> [Date accessed: 24/11/23].

<sup>35</sup> Natural England (2014) Cannock Extension Canal SAC SIP. Available at: <http://publications.naturalengland.org.uk/file/6749431462363136> [Date accessed: 25/11/23].

- 3.5.24 The SAC is fed by the Chasewater reservoir which is part of the Chasewater Southern Staffordshire Coalfield Heaths SSSI which is located upstream of the WLP area. The SAC and the Plan area are both located in the Staffordshire Trent Valley ALS area. As such the SAC will be considered further in the HRA process in terms of water supply / abstraction impacts from the WLP. Therefore, the habitat site will be scoped for further assessment in the HRA process.
- 3.5.25 Mottey Meadows SAC has been noted to be sensitive to hydrological impact<sup>36</sup>. Mottey Meadows SAC is not located within the WLP area. Both the SAC and the Plan area are located within the Trent Valley Staffordshire surface water management catchment. However, the SAC and Plan area are not hydrologically connected via surface water features and therefore water quality impacts from development in WLP are unlikely.
- 3.5.26 The SAC and the Plan area are both located in the Staffordshire Trent Valley ALS area. As such the SAC will be considered further in the HRA process in terms of water supply / abstraction impacts from the WLP. Therefore, the habitat site will be scoped for further assessment in the HRA process.
- 3.5.27 Pasturefields Saltmarsh SAC has been noted to be sensitive to hydrological impact<sup>37</sup>. As set out in Natural England's Supplementary Advice, the SAC features depend on wetland habitats supported by surface or ground water. This SAC is not located within the WLP area. Both the SAC and the Plan area are located within the Trent Valley Staffordshire surface water management catchment. However, the SAC and Plan area are not hydrologically connected via surface water features and therefore water quality impacts from development in WLP are unlikely.
- 3.5.28 The SAC and the Plan area are both located in the Staffordshire Trent Valley ALS area. As such the SAC will be considered further in the HRA process in terms of water supply / abstraction impacts from the WLP. Therefore, the habitat site will be scoped for further assessment in the HRA process.
- 3.5.29 Ensor's Pool SAC has been noted to be sensitive to hydrological impact<sup>38</sup>. Ensor's Pool SAC is not connected to the Plan area via water quality impact pathways.
- 3.5.30 Ensor's Pool SAC is located within the Tame, Anker and Mease CAMS and therefore water quantity (abstraction) impacts from the WLP are likely. Therefore, the habitat site will be scoped for further assessment in the HRA process.

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<sup>36</sup> Natural England (2014) Mottey Meadows SAC SIP. Available at:  
<https://publications.naturalengland.org.uk/publication/6519033218203648> [Date accessed:21/11/23].

<sup>37</sup> Natural England (2014) Pasturefields Salt Marsh SAC SIP. Available at:  
<https://publications.naturalengland.org.uk/publication/5513486415167488> [Date accessed: 30/11/23].

<sup>38</sup> Natural England (2014) Ensor's Pool SAC SIP. Available at:  
<https://publications.naturalengland.org.uk/publication/5364843502632960> [Date accessed: 27/11/23].



- 3.5.31 River Mease SAC has been noted to be sensitive to hydrological impact<sup>39</sup>. The River Mease SAC is located downstream of the WLP area. The WLP area feeds into the River Tame which joins the River Trent downstream of the River Mease and therefore there are no direct hydrological links to the Plan area and water quality effects from the WLP are considered unlikely.
- 3.5.32 The River Mease SAC is located within the Tame, Anker and Mease ALS area and therefore there is the potential for water quantity (abstraction) impacts from the WLP. Therefore, the habitat site will be scoped for further assessment in the HRA process.
- 3.5.33 Severn Estuary SAC / SPA / Ramsar has been noted to be sensitive to hydrological impact<sup>40</sup>. The Plan area is located within the Severn River Basin District. Watercourses draining the Plan area will ultimately drain to the Severn Estuary and it is therefore hydrologically connected to these downstream designations. In addition, these downstream designations support species of migratory fish which have the potential to move into the upper catchment for spawning and are sensitive to changes in water quality which may be caused by the WLP.
- 3.5.34 Development set out in the WLP is unlikely to affect water levels at the downstream Severn Estuary designations. Therefore, the habitat site will be scoped for further assessment in the HRA process.
- 3.5.35 Humber Estuary SAC / SPA / Ramsar has been noted to be sensitive to hydrological impact<sup>41</sup>. The Plan area is located within the Humber River Basin District. Watercourses draining the Plan area will ultimately drain to the Humber Estuary and it is therefore hydrologically connected to these downstream designations. In addition, these downstream designations support species of migratory fish which have the potential to move into the upper catchment for spawning and would be sensitive to any changes in water quality which may be caused by growth in Wolverhampton.
- 3.5.36 Development set out in the WLP is unlikely to affect water levels at the downstream Humber Estuary designations. Therefore, the habitat site will be scoped for further assessment in the HRA process.
- 3.5.37 West Midland Mosses SAC has been noted to be sensitive to hydrological impact<sup>42</sup>. West Midland Mosses SAC is not located within the WLP area. As set out in Natural England's Supplementary Advice, the SAC is sensitive to changes in water quality. However, the SAC is not hydrologically linked to the Plan area as it is located upstream.

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<sup>39</sup> Natural England (2014) River Mease SAC SIP. Available at:  
<http://publications.naturalengland.org.uk/file/6448011194400768> [Date accessed: 21/11/23].

<sup>40</sup> Natural England (2015) Severn Estuary SIP. Available at:  
<http://publications.naturalengland.org.uk/file/4856107648417792> [Date accessed: 27/11/23].

<sup>41</sup> JNCC (2007) Ramsar Information Sheet: Humber Estuary. Available at:  
<https://rsis.ramsar.org/RISapp/files/RISrep/GB663RIS.pdf> [Date accessed: 27/11/23].

<sup>42</sup> Natural England (2014) West Midland Mosses SAC SIP. Available at:  
<https://publications.naturalengland.org.uk/publication/5422476326600704> [Date accessed: 27/11/23].

- 3.5.38 The SAC and the Plan area are both located in the Staffordshire Trent Valley ALS area. As such the SAC will be considered further in the HRA process in terms of water supply / abstraction impacts from the WLP. Therefore, the habitat site will be scoped for further assessment in the HRA process.
- 3.5.39 Midland Meres and Mosses Phase 1 Ramsar and Phase 2 Ramsar has been noted to be sensitive to hydrological impact<sup>43,44</sup>, they are not located within the WLP area, and are not hydrologically linked to the Plan area as it is located upstream.
- 3.5.40 The Ramsar sites and the Plan area are both located in the Staffordshire Trent Valley ALS area. As such the Ramsar site will be considered further in the HRA process in terms of water supply / abstraction impacts from the WLP. Therefore, both habitat sites will be scoped for further assessment in the HRA process.
- 3.5.41 Fens Pools SAC has been noted to be sensitive to hydrological impact<sup>45</sup>. As set out in Natural England's Supplementary Advice, water is supplied to Fens Pools SAC from rainfall and run-off from neighbouring residential areas. As Fens Pools SAC is not located within the Plan area it is unlikely that development set out in the WLP will affect water quality at this SAC.
- 3.5.42 Fens Pools SAC is located within the Worcestershire Middle Severn ALS area, however as the SAC is fed by rainfall, LSEs due to water abstraction are unlikely. Therefore, the habitat sites will not be scoped for further assessment in the HRA process.

## 3.6 Recreational pressure

- 3.6.1 Increased recreational pressure at habitats 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, tree climbing etc. Typically, disturbance of habitats and species is the unintentional consequence of people's presence which can impact distribution of habitat types and breeding success and survival.
- 3.6.2 A common approach taken across the UK to address recreational impacts at habitats sites is to establish a 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).

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<sup>43</sup> JNCC (2008) Midland Mires and Mosses Phase 1 Ramsar. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11043.pdf> [Date accessed: 15/11/23].

<sup>44</sup> JNCC (2008) Midland Mires and Mosses Phase 2 Ramsar. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11080.pdf> [Date accessed: 15/11/23].

<sup>45</sup> Natural England (2018) Fens Pools SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6642225895440384> [Date accessed: 25/11/23].

- 3.6.3 The broad principle of buffer zones is one component of the HRA screening process for recreational pressures. This process also takes into consideration other factors such as recreational management at sites, proximity to settlements and existing recreational resources.
- 3.6.4 Where available, recreational ZOI distances have been applied to determine potential pathways of recreational effects from the WLP. The recreational draw of a habitats site depends on a number of factors. These include the extent and range of facilities provided (in particular parking), accessibility both within the habitats site and links to the wider area, incorporation of a habitats 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 habitats 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 km<sup>46</sup>. However, this review recognises that some visitors are prepared to travel longer distances to visit particular sites for instance coastal and wetland sites. As such a precautionary distance of 15km has been applied to the scoping of habitats sites at which there may be potential recreational impact pathways.
- 3.6.5 Fens Pools SAC is located within 15km of the WLP boundary, approximately 4.8km to the south of the Plan boundary and is surrounded by urban development with two Public Rights of Way (PRoW) and an off-road cycle route through its centre. It is also designated as a Local Nature Reserve (LNR) – Buckpool and Fens Pool LNR. No visitor surveys have been undertaken for the SAC and no recreational ZOI has been established. Natural England's Supplementary Advice for the SAC indicates that it is "owned and managed by Dudley Metropolitan Borough Council, and has wardens present on site throughout the week. Management aims are to maintain and increase the size and health of the amphibian assemblage on the site by maintaining and enhancing habitat through a combination of new pond creation, connecting up of existing pond networks, eradication of non-native invasive species, and the monitoring of grazing and illegal activities across the site". Given the distance of the SAC from the Plan area it will be scoped out of the HRA process.
- 3.6.6 The Cannock Extension Canal SAC is located within 15km of the WLP boundary, approximately 5.7km to the north. Natural England's Supplementary Advice for the SAC indicates that it is sensitive to human disturbance including recreational boat traffic movement. Given the presence of other canals within and immediately adjacent to the Plan area it is unlikely that there will be increased recreational pressures at this SAC from development and it will be scoped out of the HRA process.

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<sup>46</sup> Weitowitz, D, C. Panter, C. Hoskin, R. and Liley, D (2019) The effect of urban development on visitor numbers to nearby protected nature conservation sites. *Journal of Urban Ecology*, Volume 5, Issue 1. Available at: <https://academic.oup.com/jue/article/5/1/juz019/5602629> [Date accessed: 07/11/23].

- 3.6.7 Public access and disturbance are not identified as a threat/pressure at Motte Meadows SAC within the SIP or Natural England's supplementary advice. Public access to the site is limited to permit holders apart from guided walks and there are no car parks within the immediate area. The SAC is located approximately 10.5km from the Plan area. Given these factors and the fact the SAC is not vulnerable to public access and disturbance effects, it is considered unlikely that growth in the WLP will have a recreational LSE on the SAC.
- 3.6.8 At Cannock Chase SAC recreational impacts are known to be an issue for features for which the SAC is designated<sup>47,48</sup>. In order to manage the identified recreational pressures, the Cannock Chase SAC Partnership (composed of 6 Local Planning Authorities, Staffordshire County Council, Natural England, and a number of key stakeholders) was formalised under a Memorandum of Understanding (MOU) in 2016. The MOU sets out a suite of Strategic Access Management and Monitoring Measures (SAMMM) which are funded through financial contributions from new housing developments within 8km of the SAC (the zone within which visitors originated most frequently). In 2017 the Cannock Chase SAC stage 1 Planning Evidence Base Review (PEBR) was undertaken to act as a 'health check' upon the SAMMM, to review the current situation, check if the SAMMM was still fit for purpose, and act as a platform for further work going forward<sup>49</sup>. Since the 2017 review, a further evidence base has been undertaken including updated visitor surveys<sup>50</sup>. It identifies a 15km recreational Zone of Influence as illustrated on **Figure 3.2**. Wolverhampton sits within this area being located approximately 11.8km to the south of the SAC.

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<sup>47</sup> J. White, R. McGibbon & J. Underhill-Day (2012) Impacts of Recreation to Cannock Chase SAC. Unpublished report. Footprint Ecology.

<sup>48</sup> Liley, D., Underhill-Day, J., White, J. & Sharp, J. (2009) Evidence Base relating to Cannock Chase SAC and the Appropriate Assessment of Local Authority Core Strategies. Footprint Ecology.

<sup>49</sup> Hoskin, R. and Liley, D. (2017) Cannock Chase SAC Planning Evidence Base Review. Unpublished report for the Cannock Chase SAC Partnership.

<sup>50</sup> Panter, C & Liley, D., (2019) Cannock Chase Visitor Survey 2018. Unpublished report by Footprint Ecology for the Cannock Chase SAC Partnership.

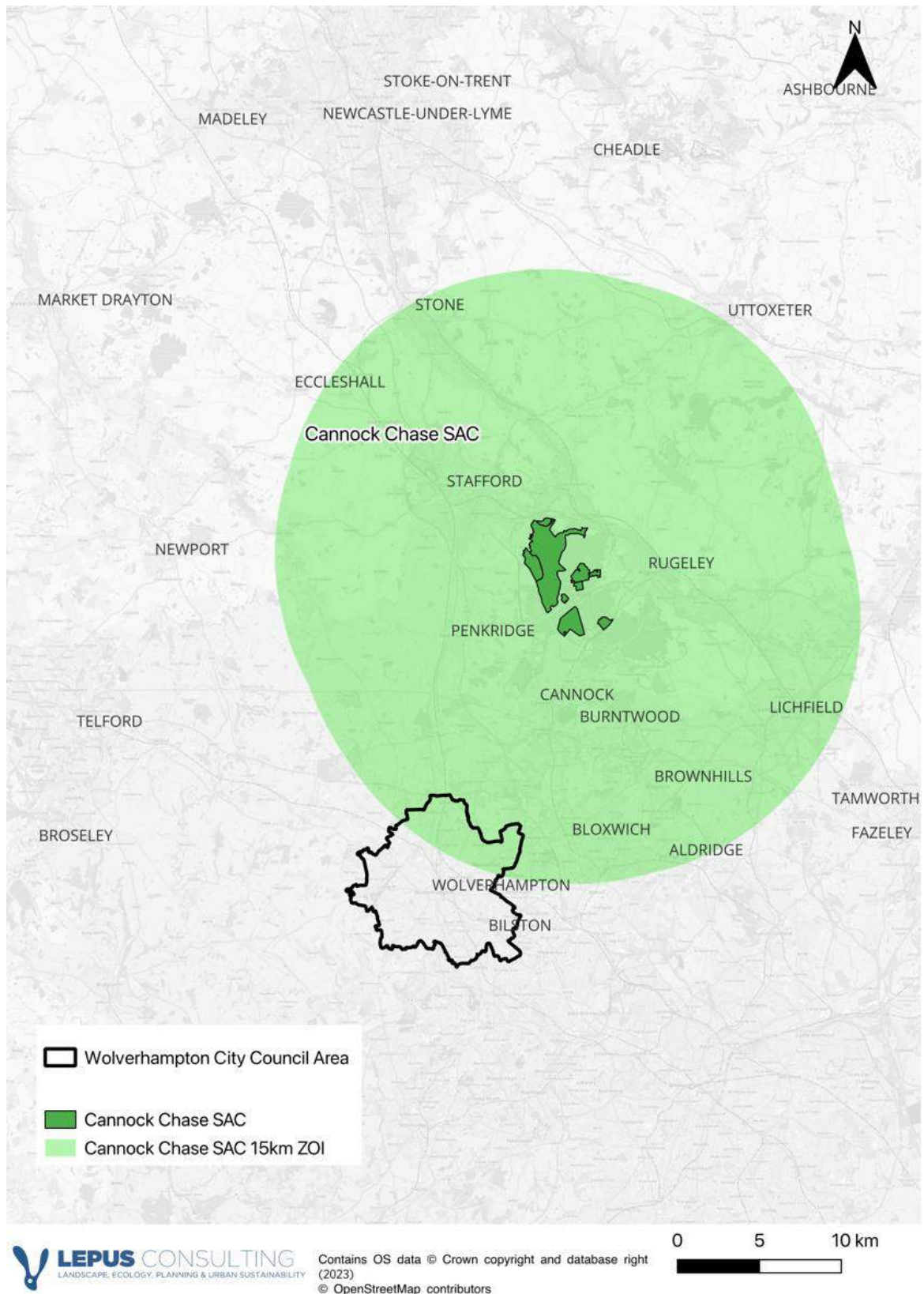


Figure 3.2: Cannock Chase SAC – Recreational Zone of Influence

### 3.7 Urbanisation effects

3.7.1 Urbanisation effects typically occur when development is located close to a habitats 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 between 400m<sup>51</sup> and 500m<sup>52</sup>. These distances recognise the distance cat predation is likely to take place and also the increased frequency of visits made by people living in close proximity to a designated site. No sites are located within 500m of the Plan area and as such urbanisation effects can be scoped out of further consideration in the HRA process.

### 3.8 Habitats sites and threats and pressures

3.8.1 **Figure 3.3** illustrates the location of habitats sites which will be scoped into the HRA process for further consideration in the screening assessment (Section 4). Impact pathways which have the potential to affect these habitats sites are summarised in Table 3.4. These will form the basis of the following HRA screening assessment.

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<sup>51</sup> Thames Basin Heaths Strategic Joint Partnership Board (2009) Thames Basin Heaths SPA Delivery Framework. Available at: <https://www.guildford.gov.uk/media/21979/Thames-Basin-Heaths-SPA-delivery-framework/pdf/thames-basin-heaths-spa-delivery-framework.pdf?m=636114482807070000> [Date accessed: 07/11/23].

<sup>52</sup> Panter, C., Liley, D., Lake, S., Saunders, P., and Caals, Z. (2022) Visitor survey, recreational impact assessment and mitigation requirements for the Chilterns Beechwoods SAC and the Dacorum Local Plan, Report by Footprint Ecology for Dacorum Borough Council.

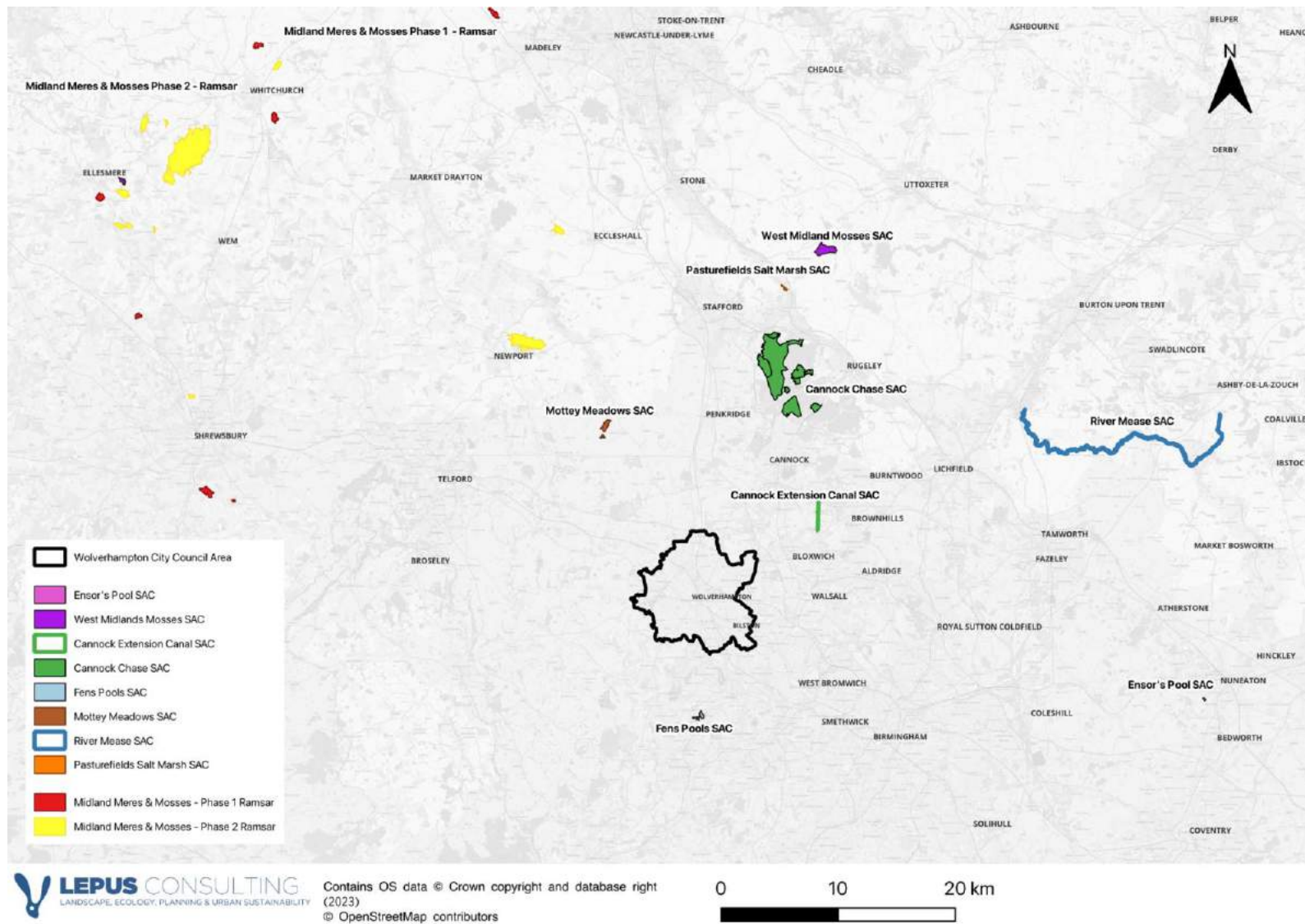
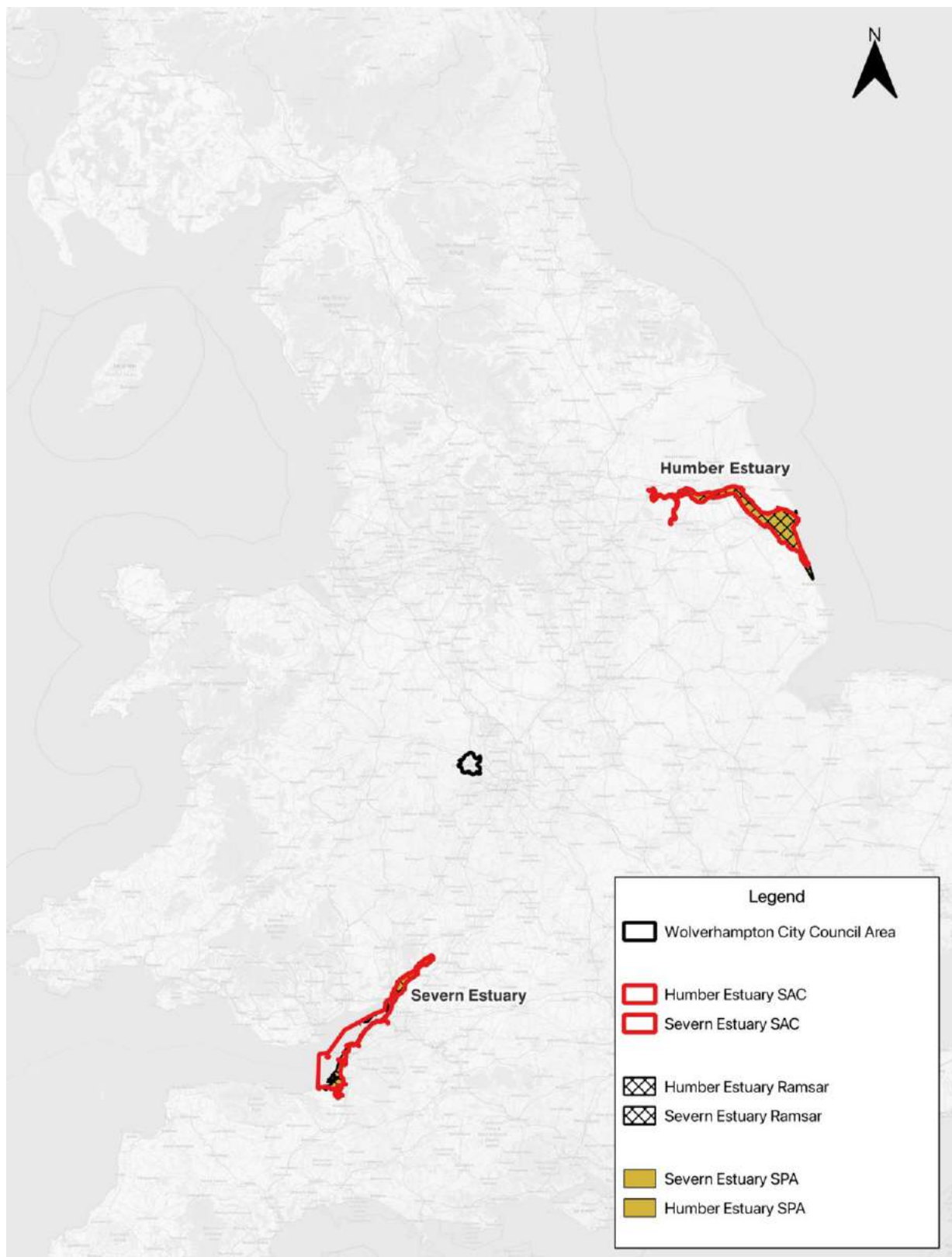


Figure 3.3: Habitats sites for consideration in the HRA process



**Figure 3.4:** Habitats Sites for consideration in the HRA process (The Humber Estuary and Severn Estuary)



**Table 3.3:** Potential impact pathways from the WLP at each habitats site

Potential impact pathways	Air pollution	Water quality and quantity changes	Recreational impacts
Habitats sites	Fens Pools SAC  Cannock Extension Canal SAC	Severn Estuary SAC / SPA / Ramsar  Humber Estuary SAC / SPA / Ramsar  Cannock Chase SAC  Cannock Extension Canal SAC Mottey Meadows SAC  Pasturefields SAC  River Mease SAC  West Midland Mosses SAC  Ensor's Pool SAC  Midland Meres and Mosses Phase 1 Ramsar  Midland Meres and Mosses Phase 2 Ramsar	Cannock Chase SAC

## 4 Preliminary screening of the Issues and Preferred Options WLP

### 4.1 Introduction

4.1.1 This section of the HRA comprises the screening stage of the HRA process (see **Figure 2.1**). The screening exercise draws on information regarding threats and pressures at habitats sites scoped into the HRA process in **Chapter 3** of this report. This chapter screens each component of the Issues and Preferred Options WLP for LSEs and identifies the requirement for Appropriate Assessment.

### 4.2 Screening

4.2.1 The WLP is not directly connected with or necessary to the management of any habitats site. Neither can it be excluded or eliminated from the HRA process. Therefore, it is necessary to identify whether there are any aspects of the Plan which may lead to LSEs at a habitats site, either alone or in combination with other plans or projects.

4.2.2 LSEs are discussed in **section 2.2** and comprise of an effect which may undermine the conservation objectives for the qualifying features of a habitats site, either alone or in-combination. Identification of LSEs will trigger the requirement for an Appropriate Assessment – Stage 2 of the HRA process. Appropriate Assessment allows effects to be assessed in more detail and mitigation measures applied.

4.2.3 Screening for LSEs is normally undertaken at the preferred options stage (Regulation 18) when policies and allocations are known, and again at Regulation 19 to ensure any changes are captured. The Issues and Preferred Options Consultation contains options for the vision and development strategy. It also contains details on site allocations and outlines which policies will be carried over from the BCP and where new policies will need to be written. It does not contain all information relating to the draft version of the Plan or fully formulated policy wording.

4.2.4 Where information is available or options have been presented, a high-level screening assessment has been made and recommendations provided. The output of the screening process is presented in **Appendix C** and **Appendix D**. The assessment of LSEs takes no account of mitigation to ensure compliance with the People Over Wind ruling<sup>53</sup>.

4.2.5 The preliminary screening assessment has concluded that LSEs, from the Issues and Preferred Options WLP in-combination with other plans or projects, could be screened out for a number of policies. This is because they fell into the following evaluation 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

<sup>53</sup> InfoCuria (2018) Case C-323/17. Available at:

<http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN> [Date accessed: 08/09/23].

- Category D: Environmental protection / site safeguarding
- Category F: Policies or proposals that cannot lead to development or other change.

4.2.6 A number of policies which will be carried over from the BCP Review (with amendments as set out in the Issues and Preferred Options consultation) were however considered to have an LSE in-combination with other plans and projects (see **Appendix D**).

4.2.7 All allocations were considered to have likely significant air quality and water effects upon habitats sites. The allocations at Former Probert Court / Health Centre, Probert Road (H20) and Former Northcote Secondary School, Northwood Park Road (H16 (H199)), see **Appendix D**, are located within 15km of Cannock Chase SAC and therefore have the potential to have in-combination recreational LSEs.

4.2.8 LSEs were identified at habitat sites detailed in **Table 3.5**.

### 4.3 Screening conclusion

4.3.1 As required under Regulation 105 of the Habitats Regulations, an assessment has been undertaken of LSEs of the Issues and Preferred Options WLP upon habitats sites. The screening evaluation checks (**Appendix C** and **Appendix D**) indicate that a number of proposed policies and all allocations set out in the Issues and Preferred Options WLP have the potential to have LSEs at the above habitats sites. This takes no account of mitigation measures that policies, or other protective frameworks, may incorporate to mitigate adverse impacts upon habitats sites. It is noted that full policy details are not provided at this stage of the plan making process and therefore this screening assessment is preliminary in nature. At Regulation 19, the WLP will be re-screened to capture any changes made in response to this Regulation 18 consultation exercise and once policy wording has been developed further.

4.3.2 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 WLP.

4.3.3 The following identifies issues which will be considered in the Appropriate Assessment. Evidence collated to date has been set out and gaps in the evidence base have been highlighted. The Appropriate Assessment will be completed alongside preparation of the Regulation 19 version of the WLP when all HRA evidence and WLP details are available.

- The Regulation 19 version of the WLP will include an assessment of strategic traffic modeling undertaken. This will allow a screening of likely significant air quality effects against Natural England's screening thresholds for Cannock Extension Canal SAC and Fens Pools SAC and inform any further work required to allow an Appropriate Assessment of this impact pathway; and
- The Regulation 19 HRA will be informed by ongoing dialogue with water suppliers in terms of WwTW capacity and water resources. It will also take into consideration the water protection framework and the WLP policy wording in this respect.
- The Regulation 19 HRA will be informed by a review of final allocation site locations and protective policy wording contained within the plan in relation to the protection of Cannock Chase SAC from increased recreational pressures.

## 5 Next steps

### 5.1 Next steps

- 5.1.1 Screening will be revisited at Regulation 19 when the WLP is further developed, all details on policies are available and to take into consideration any changes since Regulation 18.
- 5.1.2 At Regulation 19 an Appropriate Assessment will be presented in support of the Publication WLP which will allow the Council, as the Competent Authority, to make the Integrity Test. The Council will take into consideration representations from Natural England under the provisions of the Habitats Regulations at Regulation 105(2).

### 5.2 Conclusions

- 5.2.1 This HRA report provides an assessment of the Issues and Preferred Options WLP which includes options for the vision and development strategy, allocations and carried over BCP policies alongside suggested policy wording changes. It screens in LSEs at the following habitats sites:

- **Air quality LSEs** – in-combination at Cannock Extension Canal SAC and Fens Pools SAC
- **Water quality and / or quantity LSEs** – in-combination at River Mease SAC, Cannock Extension Canal SAC, Severn Estuary SAC, SPA and Ramsar, Humber Estuary SAC, SPA and Ramsar, Cannock Chase SAC, Cannock Extension Canal SAC, Mottey Meadows SAC, Pasturefields SAC, River Mease SAC, West Midland Mosses SAC, Ensor’s Pool SAC, Midland Meres and Mosses Phase 1 Ramsar and Midland Meres and Mosses Phase 2 Ramsar
- **Recreational LSEs** - in-combination at Cannock Chase SAC

## Appendix A: Plans with potential in-combination effects

Plan area / name	Plan status	Summary of housing / employment	Potential in-combination LSE
Birmingham City Council	The Birmingham Development Plan 2031 was adopted by Birmingham City Council on 10 <sup>th</sup> January 2017 <sup>1</sup> .	Approximately 51,100 dwellings, two regional investment sites of 20ha and 25ha and a 71ha employment site for the Plan period to 2031.	The combined impact of neighbouring authority growth, in-combination with the WLP, on air quality, hydrology and public access and disturbance impacts will be considered further in the HRA process.
Bromsgrove District Council	Adopted (25 <sup>th</sup> January 2017) <sup>2</sup> . The adopted Plan is currently under review.	Approximately 7,000 dwellings over the period 2011-2030. A minimum of 28ha employment growth. A review of the Plan is currently in progress. The preferred options consultation took place in 2018 with a district plan review and further update in 2019. At the time of writing a HRA has not been published to support the Plan review.	The combined impact of neighbouring authority growth, in-combination with the WLP, on air quality, hydrology and public access and disturbance impacts will be considered further in the HRA process.
South Staffordshire Council	Core Strategy Development Plan Document Adopted 2012 <sup>3</sup> A review of the South Staffordshire District Council Local Plan is	The Core Strategy was adopted in 2012 and aims to deliver 3850 homes between 2006 – 2028 and 31.52 ha of employment <sup>6</sup> .	The combined impact of neighbouring authority growth, in-combination with the WLP, on air quality, hydrology and public access and disturbance impacts will be considered further in the HRA process. In particular it is noted that this authority forms part of the Cannock Chase SAC Partnership.

<sup>1</sup> Birmingham City Council (2017) Adopted Birmingham Development plan. Available at:

[https://www.birmingham.gov.uk/downloads/file/5433/adopted\\_birmingham\\_development\\_plan\\_2031](https://www.birmingham.gov.uk/downloads/file/5433/adopted_birmingham_development_plan_2031) [Date accessed: 16/10/23].

<sup>2</sup> Bromsgrove District Council (2017) Bromsgrove District Plan 2011-2030. Available at: <https://www.bromsgrove.gov.uk/media/2673698/Adopted-BDP-January-2017.pdf> [Date accessed: 16/10/23].

<sup>3</sup> South Staffordshire District Council Local Plan (2012) South Staffordshire Council Core Strategy Development Plan Document Adopted 11<sup>th</sup> December 2012. Available at: <https://www.sstaffs.gov.uk/sites/default/files/2023-02/Core%20Strategy%20Dev%20Plan%20Doc.pdf> [Date accessed: 01/12/23].

<sup>6</sup> Walsall Council (2011) Black Country Core Strategy. Available at: <https://go.walsall.gov.uk/sites/default/files/2022-09/Black%20Country%20Core%20Strategy.pdf> [Date accessed: 01/12/23].

Plan area / name	Plan status	Summary of housing / employment	Potential in-combination LSE
	underway <sup>4,5</sup> . The public consultation on the Publication version of the Plan closed on 23 <sup>rd</sup> December 2022. The review is currently paused whilst the Council await Government proposed changes to national policy.		
Wyre Forest District Council	The District Local Plan was adopted in April 2022 <sup>7</sup> .	This Plan allocates 5,520 dwellings and 29ha of employment land between 2016-2036.	The combined impact of neighbouring authority growth in-combination with the WLP on air quality, hydrology and public access and disturbance impacts will be considered further in the HRA process.
Sandwell Metropolitan Borough Council	Sandwell Council is in the process of preparing a new Local Plan, after the production of joint Black Country Plan ceased in October 2022. The public consultation on the Sandwell Issues and Options Consultation took place between 6 <sup>th</sup> February and 20 <sup>th</sup> March 2023. Sandwell is currently	The Black Country Core Strategy was adopted in February 2011 and aims to deliver 21,489 homes and 384ha of employment land in Sandwell <sup>8</sup> .	The combined impact of neighbouring authority growth, in-combination with the WLP, on air quality, hydrology and public access and disturbance impacts will be considered further in the HRA process.

<sup>4</sup> South Staffordshire District Council (2023) South Staffordshire District Council Local Plan Review. Available at: <https://www.sstaffs.gov.uk/planning/local-plan-review-2.cfm> [Date accessed: 16/10/23].

<sup>5</sup> South Staffordshire District Council (2022) South Staffordshire Local Plan Review. Available at: [https://www.sstaffs.gov.uk/sites/default/files/2023-02/local\\_plan\\_review\\_summary.pdf](https://www.sstaffs.gov.uk/sites/default/files/2023-02/local_plan_review_summary.pdf) [Date accessed: 01/12/23].

<sup>7</sup> Wyre Forest District Council (2019) Wyre Forest District Local Plan 2016-36 Amendments to the Pre-Submission Publication Document. Available at: <https://www.wyreforestdc.gov.uk/planning-and-buildings/planning-policy/wyre-forest-district-local-plan-2016-2036/> [Date accessed: 16/10/23].

<sup>8</sup> Walsall Council (2011) Black Country Core Strategy. Available at: <https://go.walsall.gov.uk/sites/default/files/2022-09/Black%20Country%20Core%20Strategy.pdf> [Date accessed: 01/12/23].

Plan area / name	Plan status	Summary of housing / employment	Potential in-combination LSE
	consulting on the draft version of the Local Plan		
Dudley Metropolitan Borough Council	The Council is in the process of preparing a new Local Plan, after the production of the joint Black Country Plan ceased in October 2022. The Council is in the process of consulting on the draft version of the Local Plan.	The Black Country Core Strategy was adopted in February 2011 and aims to deliver 16,127 homes and 374ha of employment land in Dudley. <sup>9</sup>  The new Dudley Local Plan will include detailed policies and provisions for housing and employment allocations.	The combined impact of neighbouring authority growth, in-combination with the WLP, on air quality, hydrology and public access and disturbance impacts will be considered further in the HRA process.
Walsall Council	The Council is in the process of preparing a new Local Plan, after the production of the joint Black Country Plan ceased in October 2022. The Council is working on the Issues and Options document under Reg 18 <sup>10</sup> .	The Black Country Core Strategy was adopted in February 2011 and aims to deliver 11,973 homes and 294ha of employment land in Walsall <sup>11</sup> .  The new Walsall Plan will include detailed policies and provisions for housing and employment allocations.	This plan has the potential to act in-combination with the WLP through increased residential and employment development which may trigger in-combination recreational, urbanisation, air quality, and hydrology LSEs.  In particular it is noted. that this authority forms part of the Cannock Chase SAC Partnership.
Cannock Chase District Council	The Cannock Chase Local Plan (Part 1) was adopted in 2014 <sup>12</sup> .  In 2019 an issues and options consultation was	The Plan provides for 5,300 new houses within the district between 2006 – 2028.  2,350 new houses will be provided in the urban areas of the district, 66% in Cannock, Hednesford and Heath Hayes, 29% in Rugeley and Brereton and 5% in Norton Canes.	The combined impact of neighbouring authority growth, in-combination with the WLP, on air quality, hydrology and public access and disturbance impacts will be considered further in the HRA process.

<sup>9</sup> Walsall Council (2011) Black Country Core Strategy. Available at: <https://go.walsall.gov.uk/sites/default/files/2022-09/Black%20Country%20Core%20Strategy.pdf> [Date accessed: 01/12/23].

<sup>10</sup> Walsall Borough Local Plan. Walsall Council. Available at: <https://go.walsall.gov.uk/planning-and-building-control/planning-policy/future-planning-policy> [Date accessed: 01/12/23].

<sup>11</sup> Walsall Council (2011) Black Country Core Strategy. Available at: <https://go.walsall.gov.uk/sites/default/files/2022-09/Black%20Country%20Core%20Strategy.pdf> [Date accessed: 01/12/23].

<sup>12</sup> Cannock Chase (2014) Cannock Chase Local Plan (Part 1) 2014. Available at: [https://www.cannockchasedc.gov.uk/sites/default/files/local\\_plan\\_part\\_1\\_09.04.14\\_low\\_res.pdf](https://www.cannockchasedc.gov.uk/sites/default/files/local_plan_part_1_09.04.14_low_res.pdf) [Date accessed: 01/12/23].

Plan area / name	Plan status	Summary of housing / employment	Potential in-combination LSE
	<p>carried out, the response led to the Preferred options document 2021, which identified sites that would be suitable for new development<sup>13</sup>.</p>	<p>A requirement of 88ha of employment land for the district has been identified. 91ha of employment land has been identified as available:</p> <ul style="list-style-type: none"> <li>- 62ha for Cannock, Hednesford and Heath Hayes</li> <li>- 26ha for Rugeley and Brereton</li> <li>- 3ha for Norton Canes</li> </ul> <p>The Plan provides for a minimum of 5,516 dwellings to meet local housing needs, and an additional 500 dwellings to meet unmet needs</p>	<p>In particular it is noted that this authority forms part of the Cannock Chase SAC Partnership.</p>
<p>Stafford Borough Council</p>	<p>The new Stafford Borough Local Plan will replace the Plan for Stafford Borough 2011-2031 which was adopted in June 2014<sup>14</sup> and Part 2 of the Plan for Stafford Borough was adopted in January 2017.</p> <p>The Plan review is currently at the Preferred Options stage of the planning process, (Local Plan 2020 – 2040)<sup>15</sup>.</p>	<p>The adopted Plan makes provision for 500 new homes per year over the Plan period.</p>	<p>The combined impact of neighbouring authority growth, in-combination with the WLP, on air quality, hydrology and public access and disturbance impacts will be considered further in the HRA process.</p> <p>In particular it is noted that this authority forms part of the Cannock Chase SAC Partnership.</p>

<sup>13</sup> Cannock Chase Council (2021) Cannock Chase Council Local Plan Preferred Options February 2021. Available at: <https://www.cannockchasedc.gov.uk/residents/planning/planning-policy/cannock-chase-local-plan> [Date accessed: 16/10/23].

<sup>14</sup> Stafford Borough Council (2014) The Plan for Stafford Borough 2011 – 2031, Adopted 19 June 2014. Available at: <https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/Plan%20for%20Stafford%20Borough/PFSB-Adoption.pdf> [Date accessed:01/12/23].

<sup>15</sup> Stafford Borough Council (2022) Stafford borough Local Plan 2020 – 2040 Preferred options. Available at: <https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Preferred%20Options/New-Local-Plan-Preferred-Options.pdf> [Date accessed:01/12/23].



Plan area / name	Plan status	Summary of housing / employment	Potential in-combination LSE
East Staffordshire Borough Council	The Local Plan was adopted on 15 <sup>th</sup> October 2015 <sup>16</sup> .	The Plan allocates 11,648 dwellings over the Plan period from 2012-2031 and provision of 40 ha of employment land.	<p>The combined impact of neighbouring authority growth, in-combination with the WLP, on air quality, hydrology and public access and disturbance impacts will be considered further in the HRA process.</p> <p>In particular it is noted that this authority forms part of the Cannock Chase SAC Partnership.</p>
Shropshire Council	<p>The current Shropshire Plan consists of</p> <ul style="list-style-type: none"> <li>• The Core Strategy (2011)<sup>17</sup>.</li> <li>• The Site Allocations Management of Development Plan (2015)<sup>18</sup>.</li> </ul> <p>The council are in the process of reviewing the Plan and are currently at examination<sup>19</sup>.</p>	<p>The adopted Plan allocates 27,500 homes and 290 ha of employment lands over the Plan period (2010 – 2020).</p> <p>The Regulation 19 version of the new Local Plan allocates 30,800 new dwellings and around 300 hectares of employment land over the Plan period from 2016 – 2038.</p>	<p>This Plan has the potential to act in-combination with the WLP through increased residential and employment development which may trigger in-combination recreational, urbanisation, air quality, and hydrology LSEs</p>

<sup>16</sup> East Staffordshire Borough Council (2015) East Staffordshire Borough Council Local Plan Planning for change 2012 – 2031. Available at: <https://www.eaststaffsbc.gov.uk/sites/default/files/docs/planning/planningpolicy/localplan2012-2031/Local-Plan-2012-2031-FINAL.pdf> [Date accessed: 27/11/23].

<sup>17</sup> Shropshire Council (2011) Shropshire Local Development Framework: Adopted Core Strategy. Available at: <https://www.shropshire.gov.uk/media/8534/core-strategy.pdf> [Date accessed; 01/12/23].

<sup>18</sup> Shropshire Council (2015) Shropshire Council Site Allocation and Management of development (SAMDev) Plan – Adopted Plan. Available at: <https://www.shropshire.gov.uk/media/23675/1214-site-allocations-and-management-of-development-samdev-plan-113062411.pdf> [Date accessed:01/12/23].

<sup>19</sup> Shropshire Council (2020) Shropshire Council Regulation 19: Pre – Submission Draft of the Shropshire Local Plan 2016 to 2038. December 2020. Available at: <https://www.shropshire.gov.uk/media/21100/sd002-draft-shropshire-local-plan.pdf> [Date accessed: 27/11/23].

Plan area / name	Plan status	Summary of housing / employment	Potential in-combination LSE
The West Midlands Strategic Transport Plan	The Strategic Transport Plan was adopted in June 2016 <sup>20</sup> .	The Plan aims to make better use of existing transport capacity (e.g. through smart technology and demand management) alongside promoting and improving public transport, cycling and walking. It sets out a number of key transport and infrastructure priorities to deliver this.	The combined impact of Strategic Transport Plan strategies, in-combination with WLP growth, on traffic related air quality will be considered further in the HRA process.
Severn River Basin Management Plan	Published. October 2022 <sup>21</sup>	RBMPs contain the following information to protect water bodies within each catchment: <ul style="list-style-type: none"> <li>- Baseline classification of water bodies</li> <li>- Statutory objectives for protected areas</li> <li>- Statutory objectives for water bodies</li> <li>- A summary program of measures to achieve statutory objectives.</li> </ul>	This Plan aims to protect the water environment. It has the potential to have a positive in-combination effect with the WLP on the water environment.
Humber River Basin Management Plan	Published. October 2022 <sup>22</sup> .	RBMPs contain the following information to protect water bodies within each catchment: <ul style="list-style-type: none"> <li>• Baseline classification of water bodies</li> <li>• Statutory objectives for protected areas</li> <li>• Statutory objectives for water bodies</li> <li>• A summary program of measures to achieve statutory objectives.</li> </ul>	This Plan aims to protect the water environment. It has the potential to have a positive in-combination effect with the WLP on the water environment.

<sup>20</sup> West Midlands Combined Authority (2016) West Midlands Strategic Transport Plan. Available at: [https://www.wmca.org.uk/media/1372/2016-06-01-mfg-full-document\\_wmca.pdf](https://www.wmca.org.uk/media/1372/2016-06-01-mfg-full-document_wmca.pdf) [Date accessed: 16/10/23].

<sup>21</sup> Environmental Agency (2022) River Basin Management Plans, updated 2022: progress report. 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#purpose-of-this-document> [Date accessed: 14/11/23].

<sup>22</sup> Environment Agency (2015) Humber River Basin District River Basin Management Plan. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/718328/Humber\\_RBD\\_Part\\_1\\_river\\_basin\\_management\\_plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718328/Humber_RBD_Part_1_river_basin_management_plan.pdf) [Date accessed: 16/10/23].

Plan area / name	Plan status	Summary of housing / employment	Potential in-combination LSE
Severn Trent Water Resources Management Plan	<p>Published August 2019<sup>23</sup>.</p> <p>A draft version of the updated WRMP was published in November 2022<sup>24</sup></p>	<p>Severn Trent’s fourth published Water Resources Management Plan (WRMP) demonstrates the long-term plans in place to accommodate the impacts of population growth, drought, our environmental obligations, and climate change uncertainty in order to balance the supply and demand for water in the communities.</p> <p>The Plan sets out the future of supply and demand within the Plan years of 2040 – 2041. This Plan outlines the range of challenges on supply and demand of water.</p>	<p>This Plan aims to protect the water environment. It has the potential to have a positive in-combination effect with the WLP on the water environment.</p>
South Staffs Water Resources Management Plan	<p>Published December 2019<sup>25</sup>.</p> <p>A draft version of the revised WRMP was published in November 2022<sup>26</sup>.</p>	<p>South Staffs Water’s published WRMP demonstrates the long-term plans in place to accommodate the impacts of population growth, drought, our environmental obligations, and climate change uncertainty in order to balance the supply and demand for water in the communities.</p> <p>This revised WRMP covers the period of 2025 – 2050 and takes into consideration population growth and climate change. The plan demonstrates the intention to maintain the balance between supply and demand of water over the next 25 years.</p>	<p>This Plan aims to protect the water environment. It has the potential to have a positive in-combination effect with the WLP on the water environment.</p>

<sup>23</sup> Severn Trent (2019) Water Resources Management Plan 2019. Available at: <https://www.severntrent.com/content/dam/stw-plc/our-plans/severn-trent-water-resource-management-plan.pdf> [Date accessed: 16/10/23].

<sup>24</sup> Severn Trent (2022) Draft Water Resources Management Plan 2024. Available at <https://www.severntrent.com/content/dam/dwrmp24-st/STdWRMP24-Main-Narrative.pdf> [Date accessed:27/11/23].

<sup>25</sup> South Staffs Water (2019) Water Resources Management Plan 2019. Available at: <https://www.south-staffs-water.co.uk/media/2676/final-wrmp-2019-south-staffs-water.pdf> [Date accessed: 16/10/23].

<sup>26</sup> South Staffs Water (2022) South Staffs Water Revised Draft Water Resources Management Plan. Available at: <https://www.south-staffs-water.co.uk/media/4287/sst-revised-draft-wrmp-may-2023.pdf> [Date accessed: 27/11/23].

# Appendix B: Habitats site conservation objectives, qualifying features, threats and pressures

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

#### 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
- The structure and function (including typical species) of qualifying natural habitats
- The supporting processes on which the qualifying natural habitats rely.

#### Qualifying Features:

H4010. Northern Atlantic wet heaths with *Erica tetralix*; wet heathland with cross-leaved heath  
H4030. European dry heaths

#### Threats and pressures at habitats site which may be affected by the WLP<sup>2</sup>:

- Hydrological changes
- Water quality
- Air pollution – impact of nitrogen deposition
- Conservation measures (recreational impact)

### Cannock Extension Canal SAC<sup>3</sup>

#### 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
- The distribution of qualifying species within the site.

#### Qualifying Features:

S1831. *Luronium natans*; Floating water-plantain

#### Threats and pressures at habitats site which may be affected by the WLP<sup>4</sup>:

- Water pollution (water quality and water clarity)
- Water levels
- Air pollution – impact of nitrogen deposition
- Disturbance of habitat by human activity

<sup>1</sup>Natural England (2018) Cannock Chase SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/6687924741472256> [Date accessed: 24/11/23].

<sup>2</sup> Natural England (2014) Cannock Chase SAC SIP. Available at: <http://publications.naturalengland.org.uk/publication/4957799888977920> [Date accessed: 24/11/23].

<sup>3</sup> Natural England (2018) Cannock Extension Canal SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/5063623810482176> [Date accessed: 24/11/23].

<sup>4</sup> Natural England (2014) Cannock Extension Canal SAC SIP. Available at: <http://publications.naturalengland.org.uk/file/6749431462363136> [Date accessed: 25/11/23].

## Fens Pools SAC<sup>5</sup>

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

### Qualifying features:

S1166. *Triturus cristatus*, great crested newt.

### Threats and pressures at habitats site which may be affected by the WLP<sup>6</sup>:

- Water pollution
- Water quality and quantity
- Habitat fragmentation
- Air quality

## Midland Mires and Mosses (Phase 1) Ramsar<sup>7</sup>

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	The site comprises a diverse range of habitats from open water to raised bog.
2	Supports a number of rare species of plants associated with wetlands, including five nationally scarce species, together with an assemblage of rare wetland invertebrates (three endangered insects and five other British Red Data Book species of invertebrates).

### Threats and Pressures at habitats site which may be affected by the WLP<sup>8</sup>:

No issues have been identified on this site.

<sup>5</sup> Natural England (2018) Fens Pools SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6642225895440384> [Date accessed: 25/11/23].

<sup>6</sup> Natural England (2014) Fens Pools SAC SIP. Available at: <http://publications.naturalengland.org.uk/file/4872756676001792> [Date accessed: 25/11/23].

<sup>7</sup> JNCC (2008) Midland Mires and Mosses Phase 1 Ramsar. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11043.pdf> [Date Accessed: 15/11/23].

<sup>8</sup> JNCC (2008) Midland Mires and Mosses Phase 1 Ramsar. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11043.pdf> [Date Accessed: 15/11/23].

### Midland Mires and Mosses (Phase 2) Ramsar<sup>9</sup>

Ramsar sites do not have 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	The site comprises a diverse range of habitats from open water to raised bog.
2	Supports a number of rare species of plants associated with wetlands, including the nationally scarce cowbane <i>Cicuta virosa</i> and, elongated sedge <i>Carex elongata</i> . Also present are the nationally scarce bryophytes <i>Dicranum affine</i> and Sphagnum pulchrum.  Also supports an assemblage of invertebrates including several rare species. There are 16 species of British Red Data Book insect listed for this site including the following endangered species: the moth <i>Glyphipteryx lathamella</i> , the caddisfly <i>Hagenella clathrata</i> and the sawfly <i>Trichiosoma vitellinae</i> .

#### Threats and pressures at habitats site which may be affected by the WLP<sup>10</sup>:

No issues have been identified on this site.

### Mottey Meadows SAC<sup>11</sup>

#### 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
- The structure and function (including typical species) of qualifying natural habitats
- The supporting processes on which qualifying natural habitats rely.

#### Qualifying features:

H6510. Lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*)

#### Threats and pressures at habitats site which may be affected by the WLP<sup>12</sup>

- Water pollution
- Hydrological changes
- Water abstraction
- Water quality
- Air quality

<sup>9</sup> JNCC (2008) Midland Mires and Mosses Phase 2 Ramsar. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11080.pdf> [Date Accessed: 15/11/23].

<sup>10</sup> JNCC (2008) Midland Mires and Mosses Phase 2 Ramsar. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11080.pdf> [Date Accessed: 15/11/23].

<sup>11</sup> Natural England (2014) Mottey Meadows SAC Conservation Objective. Available at: <https://publications.naturalengland.org.uk/publication/5720449535180800> [Date Accessed:15/11/23].

<sup>12</sup> Natural England (2014) Mottey Meadows SAC SIP. Available at: <https://publications.naturalengland.org.uk/publication/6519033218203648> [Date accessed:21/11/23].

### River Mease SAC<sup>13</sup>

#### 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
- The distribution of qualifying species within the site.

#### Qualifying features:

H3260. Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-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 habitats site which may be affected by the WLP<sup>14</sup>:

- Water pollution (water quality and water clarity) – specific targets set for water quality and flows<sup>15</sup>
- Water abstraction

### Pasturefields Saltmarsh SAC<sup>16</sup>

#### 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
- The structure and function (including typical species) of qualifying natural habitats
- The supporting processes on which qualifying natural habitats rely.

#### Qualifying features:

H1340. Inland salt meadows; Inland saltmarshes

#### Threats and pressures at habitats site which may be affected by the WLP<sup>17</sup>

No issues have been identified on this site.

<sup>13</sup> Natural England (2016) River Mease SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/6217720043405312> [Date accessed: 24/11/23].

<sup>14</sup> Natural England (2014) River Mease SAC SIP. Available at: <http://publications.naturalengland.org.uk/file/6448011194400768> [Date accessed: 21/11/23].

<sup>15</sup> Natural England (2014). River Mease Moving towards common standards monitoring guidance targets for SAC rivers. Available at: <http://publications.naturalengland.org.uk/file/5583205847531520> [Date accessed: 27/11/23].

<sup>16</sup> Natural England (2014) Pasturefields Salt Marsh SAC Conservation Objective. Available at: <https://publications.naturalengland.org.uk/publication/6292877810335744> [Date Accessed: 21/11/23].

<sup>17</sup> Natural England (2014) Pasturefields Salt Marsh SAC SIP. Available at: <https://publications.naturalengland.org.uk/publication/5513486415167488> [Date Accessed: 30/11/23].



## Pasturefields Saltmarsh SAC<sup>16</sup>

Within the Supplementary Notes

- Water quality and quantity
- Air quality

## Humber Estuary SAC<sup>18</sup>

### 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
- 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

H1150. Coastal lagoons

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 habitats site which may be affected by the WLP<sup>19</sup>:

- Water pollution
- Public access / disturbance
- Air pollution

<sup>18</sup> Natural England (2018) Humber Estuary SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/5009545743040512> [Date accessed: 27/11/23].

<sup>19</sup> Natural England (2015) Humber Estuary SIP. Available at: <http://publications.naturalengland.org.uk/file/5730884670980096> [Date accessed: 27/11/23].

## Humber Estuary SPA<sup>20</sup>

### 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
- The distribution of the qualifying features within the site.

### Qualifying features:

A021 *Botaurus stellaris*; great bittern (Non-breeding)

A021 *Botaurus stellaris*; great bittern (Breeding)

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

A081 *Circus aeruginosus*; eurasian marsh harrier (Breeding)

A082 *Circus cyaneus*; hen harrier (Non-breeding)

A132 *Recurvirostra avosetta*; pied avocet (Non-breeding)

A132 *Recurvirostra avosetta*; pied avocet (Breeding)

A140 *Pluvialis apricaria*; european golden plover (Non-breeding)

A143 *Calidris canutus*; red knot (Non-breeding)

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 habitats site which may be affected by the WLP<sup>21</sup>:

- Water pollution
- Public access / disturbance
- Air pollution

## Humber Estuary Ramsar<sup>22</sup>

Ramsar sites do not have 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.

<sup>20</sup> Natural England (2019) Humber Estuary SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/5382184353398784> [Date accessed: 27/11/23].

<sup>21</sup> Natural England (2015) Humber Estuary SIP. Available at: <http://publications.naturalengland.org.uk/file/5730884670980096> [Date accessed: 27/11/23].

<sup>22</sup> JNCC (2007) Ramsar Information Sheet: Humber Estuary. Available at: <https://rsis.ramsar.org/RSapp/files/RSrep/GB663RIS.pdf> [Date accessed: 27/11/23].

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. It is a large macro-tidal coastal plain estuary with high suspended sediment loads, which feed a dynamic and rapidly changing system of accreting and eroding intertidal and subtidal mudflats, sandflats, saltmarsh and reedbeds. Examples of both strandline, foredune, mobile, semi-fixed dunes, fixed dunes and dune grassland occur on both banks of the estuary and along the coast. The estuary supports a full range of saline conditions from the open coast to the limit of saline intrusion on the tidal rivers of the Ouse and Trent. Wave exposed sandy shores are found in the outer/open coast areas of the estuary. These change to the more moderately exposed sandy shores and then to sheltered muddy shores within the main body of the estuary and up into the tidal rivers. The lower saltmarsh of the Humber is dominated by common cordgrass <i>Spartina anglica</i> and annual glasswort <i>Salicornia</i> communities. Low to mid marsh communities are mostly represented by sea aster <i>Aster tripolium</i>, common saltmarsh grass <i>Puccinellia maritima</i> and sea purslane <i>Atriplex portulacoides</i> communities. The upper portion of the saltmarsh community is atypical, dominated by sea couch <i>Elytrigia atherica</i> (<i>Elymus pycnanthus</i>) saltmarsh community. In the upper reaches of the estuary, the tidal marsh community is dominated by the common reed <i>Phragmites australis</i> fen and sea club rush <i>Bolboschoenus maritimus</i> swamp with the couch grass <i>Elytrigia repens</i> (<i>Elymus repens</i>) saltmarsh community. Within the Humber Estuary Ramsar site there are good examples of four of the five physiographic types of saline lagoon.</p>
3	<p>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>.</p>
5	<p>Assemblages of international importance: 153,934 waterfowl, non-breeding season (5 year peak mean 1996/97-2000/2001)</p>
6	<p>Species/populations occurring at levels of international importance. Qualifying species/populations (as identified at designation): Species with peak counts in winter:</p> <ul style="list-style-type: none"> <li>• 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)</li> <li>• Eurasian golden plover, <i>Pluvialis apricaria</i>, altifrons 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)</li> <li>• Red Knot, <i>Calidris canutus</i> islandica subspecies - 28165 individuals, representing an average of 6.3% of the population (5 year peak mean 1996/7-2000/1)</li> <li>• 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)</li> <li>• Black-tailed godwit, <i>Limosa limosa</i>, islandica subspecies - 1,113 individuals, wintering, representing an average of 3.2% of the population (5 year peak mean 1996/7-2000/1)</li> <li>• Bar-tailed godwit, <i>Limosa lapponica</i>, lapponica subspecies - 2,752 individuals, wintering, representing an average of 2.3% of the population (5 year peak mean 1996/7-2000/1)</li> </ul>

Ramsar Criterion	Justification for the application of each criterion
	<ul style="list-style-type: none"> <li>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)</li> </ul>
8	The Humber Estuary acts as an important migration route for both river lamprey <i>Lampetra fluviatilis</i> and sea lamprey <i>Petromyzon marinus</i> between coastal waters and their spawning areas.

**Threats and Pressures at habitats site which may be affected by the WLP:**

- Water pollution (domestic sewage)
- Recreational / tourism disturbance
- Coastal squeeze

**Severn Estuary SAC<sup>23</sup>**

**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
- The distribution of qualifying species within the site.

**Qualifying features:**

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

H1130. Estuaries

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

H1170. Reefs

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

S1095. *Petromyzon marinus*, sea lamprey

S1099. *Lampetra fluviatilis*, river lamprey

S1103. *Alosa fallax*, twaite shad

**Threats and pressures at habitats site which may be affected by the WLP<sup>24</sup>:**

- Public access / disturbance
- Water pollution
- Air pollution

<sup>23</sup> Natural England (2019) Severn Estuary SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6377265718099968> [Date accessed: 27/11/23].

<sup>24</sup> Natural England (2015) Severn Estuary SIP. Available at: <http://publications.naturalengland.org.uk/file/4856107648417792> [Date accessed: 27/11/23].

## Severn Estuary SPA<sup>25</sup>

### 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
- 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)

A394 *Anser albifrons albifrons*; greater white-fronted goose (Non-breeding) waterbird assemblage

### Threats and pressures at habitats site which may be affected by the WLP<sup>26</sup>:

- Public access / disturbance
- Impacts from development
- Air pollution

## Severn Estuary Ramsar<sup>27</sup>

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets.

Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
1	Due to immense tidal range (second-largest in world), this affects both the physical environment and biological communities.
3	Due to unusual estuarine communities, reduced diversity and high productivity.
4	This site is important for the run of migratory fish between sea and river via estuary. Species include: Salmon <i>Salmo salar</i> Sea trout <i>S. trutta</i> Sea lamprey <i>Petromyzon marinus</i> River lamprey <i>Lampetra fluviatilis</i>

<sup>25</sup> Natural England (2019) Severn Estuary SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6288530213175296> [Date accessed: 27/11/23].

<sup>26</sup> Natural England (2015) Severn Estuary SIP. Available at: <http://publications.naturalengland.org.uk/file/4856107648417792> [Date accessed: 27/11/23].

<sup>27</sup> JNCC (2008) Ramsar Information Sheet: UK11081 Severn Estuary. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11081.pdf> [Date accessed: 27/11/23].

Ramsar Criterion	Justification for the application of each criterion
	<p>Allis shad <i>Alosa alosa</i>                      Twaite shad <i>A. fallax</i>                      Eel <i>Anguilla anguilla</i></p> <p>It is also of particular importance for migratory birds during spring and autumn.</p>
5	<p>Assemblages of international importance: Species with peak counts in winter:</p> <ul style="list-style-type: none"> <li>• 70919 waterfowl (5 year peak mean 1998/99-2002/2003)</li> </ul>
6	<p>Species/populations occurring at levels of international importance.                      Qualifying species/populations (as identified at designation): Species with peak counts in winter:</p> <ul style="list-style-type: none"> <li>• 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)</li> <li>• 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)</li> <li>• 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)</li> <li>• 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)</li> <li>• 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)</li> <li>• 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)</li> </ul> <p>Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species regularly supported during the breeding season:</p> <ul style="list-style-type: none"> <li>• 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)</li> </ul> <p>Species with peak counts in spring/autumn:</p> <ul style="list-style-type: none"> <li>• 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)</li> </ul> <p>Species with peak counts in winter:</p> <ul style="list-style-type: none"> <li>• 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)</li> <li>• 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)</li> </ul>

Ramsar Criterion	Justification for the application of each criterion
8	<p>The fish of the whole estuarine and river system is one of the most diverse in Britain, with over 110 species recorded.</p> <p>Salmon <i>Salmo salar</i>, sea trout <i>S. trutta</i>, sea lamprey <i>Petromyzon marinus</i>, river lamprey <i>Lampetra fluviatilis</i>, allis shad <i>Alosa alosa</i>, twaite shad <i>A. fallax</i>, and eel <i>Anguilla anguilla</i> use the Severn Estuary as a key migration route to their spawning grounds in the many tributaries that flow into the estuary.</p> <p>The site is important as a feeding and nursery ground for many fish species particularly allis shad <i>Alosa alosa</i> and twaite shad <i>A. fallax</i> which feed on mysid shrimps in the salt wedge.</p>

**Threats and pressures at habitats site which may be affected by the WLP:**

- Recreational / tourism disturbance.

**West Midlands Mosses SAC<sup>28</sup>**

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

**Qualifying features:**

S1166. *Triturus cristatus*, great crested newt.

**Threats and pressures at habitats site which may be affected by the WLP<sup>29</sup>:**

- Water pollution
- Habitat fragmentation
- Air quality

**Ensor's Pool SAC<sup>30</sup>**

**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

<sup>28</sup> Natural England (2014) West Midland Mosses SAC Conservation Objective. Available at: <https://publications.naturalengland.org.uk/publication/6449667604742144> [Date Accessed: 21/11/23].

<sup>29</sup> Natural England (2014) West Midland Mosses SAC SIP. Available at: <https://publications.naturalengland.org.uk/publication/5422476326600704> [Date accessed: 27/11/23].

<sup>30</sup> Natural England (2014) Ensor's Pool SAC Conservation Objective. Available at: <https://publications.naturalengland.org.uk/publication/6577286383927296> [Date Accessed: 21/11/23].

### Ensor's Pool SAC<sup>30</sup>

- The populations of qualifying species
- The distribution of qualifying species within the site.

#### **Qualifying features:**

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

#### **Threats and Pressures at habitats site which may be affected by the WLP<sup>31</sup>:**

No issues have been identified on this site.

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<sup>31</sup> Natural England (2014) Ensor's Pool SAC SIP. Available at: <https://publications.naturalengland.org.uk/publication/5364843502632960>  
[Date accessed: 27/11/23].



# Appendix C: Preliminary screening of issues and preferred options consultation

## Vision and strategic objectives

Issues and Preferred Options <sup>1</sup>	Summary of Plan element	Key HRA related issues for consideration in HRA and plan-making process
Vision and strategic priorities	The vision for Wolverhampton is informed by 15 Strategic Priorities. These provide a general statement of policy / general aspirations for the Borough over the Plan period.	The vision and strategic priorities (in particular priority 4) provide a positive framework for nature conservation and will be drawn upon to inform the HRA process.

## Growth and Spatial Options

Housing Growth Options	Summary of Plan element	Key HRA related issues for consideration in HRA and plan making process
Option H1	Carry forward existing housing allocations which focus housing growth in urban area:  Around 9,722* homes on existing supply in urban area.	All growth in the WLP has the potential to have a Likely Significant Effect (LSE) upon habitats sites (sites and pathways of impact are set out in the main HRA report) and areas of functionally linked land. Individual housing allocations are assessed in detail in <b>Appendix D</b> .
Option H2	Carry forward existing housing allocations and make new allocations which focus housing growth in urban areas, with increased density in accessible locations and structural change in centres: <ul style="list-style-type: none"> <li>• Around 9,722* homes on existing supply in urban area</li> <li>• 61 homes on one new allocation (following discount)</li> <li>• 524* homes from density uplift and structural change in Wolverhampton City Centre</li> </ul>	All growth in the WLP has the potential to have a LSE upon habitats sites (sites and pathways of impact are set out in the main HRA report) and areas of functionally linked land. This option allocates more housing than option H1, therefore the impact is likely to be greater. Individual housing allocations are assessed in detail in <b>Appendix D</b> .
Option H3	Carry forward existing housing allocations and make new allocations which focus housing growth in urban area, with increased density in accessible locations and structural change in centres, and export remaining housing need to neighbouring authorities: <ul style="list-style-type: none"> <li>• Around 9,722* homes on existing supply in urban area</li> <li>• 61 homes on one new allocation (following discount)</li> <li>• Around 524* homes from density uplift and structural change in centres</li> <li>• Around 11,413* homes exported through Duty to Cooperate</li> </ul>	All growth in the WLP has the potential to have a LSE upon habitats sites (sites and pathways of impact are set out in the main HRA report) and areas of functionally linked land. This option allocates more housing than options H1 and H2, therefore the impact is likely to be greater. Individual housing allocations are assessed in detail in <b>Appendix D</b> .

<sup>1</sup> Wolverhampton City Council (2024) Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024.

Gypsy and Traveller Pitch Options	Summary of Plan element	Key HRA related issues for consideration in HRA and plan making process
Option G1	<p>Make use of existing sites to deliver new gypsy and traveller pitches up to 2032:</p> <ul style="list-style-type: none"> <li>• 2 pitches regularised on currently unauthorised site</li> <li>• 12 pitches on existing allocated site</li> </ul>	<p>All growth in the WLP has the potential to have a LSE upon habitats sites (sites and pathways of impact are set out in the main HRA report) and areas of functionally linked land.</p> <p>Individual Gypsy and Traveller pitch allocation are assessed in detail in <b>Appendix D</b>.</p>
Option G2	<p>Make use of existing and potential new sites to deliver new gypsy and traveller pitches up to 2032:</p> <ul style="list-style-type: none"> <li>• 2 pitches regularised on currently unauthorised site</li> <li>• 12 pitches on existing allocated site</li> <li>• 19 pitches exported through Duty to Cooperate</li> </ul>	<p>All growth in the WLP has the potential to have a LSE upon habitats sites (sites and pathways of impact are set out in the main HRA report) and areas of functionally linked land. Individual Gypsy and Traveller pitch allocation are assessed in detail in <b>Appendix D</b>. This option allocates more pitches than option G1, therefore the impacts are likely to be greater.</p>

Employment Land Growth Options	Summary of Plan element	Key HRA related issues for consideration in HRA and plan making process
Option E1	<p>Carry forward existing employment allocations:                      47.4 ha on existing employment land supply in urban area (including completions since 2020).</p>	<p>All growth in the WLP has the potential to have a LSE upon habitats sites (sites and pathways of impact are set out in the main HRA report) and areas of functionally linked land. Individual employment allocations are assessed in detail in <b>Appendix D</b>.</p>
Option E2	<p>Carry forward existing employment allocations and make new employment allocations in locations suitable for employment use and with good transport access:</p> <ul style="list-style-type: none"> <li>• 47.4 ha on existing employment land supply in urban area</li> <li>• 15.3 ha on new allocations</li> </ul>	<p>All growth in the WLP has the potential to have a LSE upon habitats sites (sites and pathways of impact are set out in the main HRA report) and areas of functionally linked land. Individual employment allocations are assessed in detail in Appendix D. This option allocates more employment land options than E1, therefore the impacts are likely to be greater.</p>
Option E3	<p>Carry forward existing employment allocations and make new employment allocations in locations suitable for employment use and with good transport access, and explore remaining employment land need to neighbouring authorities:</p> <ul style="list-style-type: none"> <li>• 47.4 ha on existing employment land supply in urban area</li> <li>• 15.3 ha on new allocations</li> <li>• 53.3 ha exported through Duty to Cooperate</li> </ul>	<p>All growth in the WLP has the potential to have a LSE upon habitats sites (sites and pathways of impact are set out in the main HRA report) and areas of functionally linked land. Individual employment allocations are assessed in detail in <b>Appendix D</b>. This option allocates more employment land options than E1 and E2, therefore the impacts are greater.</p>

Spatial Strategy Options	Summary of Plan element	Key HRA related issues for consideration in HRA and plan making process
Option A	<p>“Business as Usual” – retain current housing and employment allocations in urban area and protect green belt.</p>	<p>All growth in the WLP has the potential to have a LSE upon habitats sites (sites and pathways of impact are set out in the main HRA report) and areas of functionally linked land. All options protect the green belt which is likely to have positive benefits for habitats sites in terms of providing alternative recreational space.</p>

Spatial Strategy Options	Summary of Plan element	Key HRA related issues for consideration in HRA and plan making process
Option B	Employment-Led - reconfigure uses in the urban area to promote local employment and mixed use; retain and intensify employment land and protect green belt.	<p>All growth in the WLP has the potential to have a LSE upon habitats sites (sites and pathways of impact are set out in the main HRA report) and areas of functionally linked land. Locating jobs close to homes would reduce commuting distance and therefore have a knock-on positive impact upon air quality. This may have a beneficial effect upon habitats sites (and areas of functionally linked land) which may be sensitive to air pollution.</p> <p>All options protect the green belt which is likely to have positive benefits for habitats sites in terms of providing alternative recreational space.</p>
Option C	Market-Led – only allocate housing in high demand areas and employment land in most attractive commercial locations.	<p>All growth in the WLP has the potential to have a LSE upon habitats sites (sites and pathways of impact are set out in the main HRA report) and areas of functionally linked land.</p> <p>All options protect the green belt which is likely to have positive benefits for habitats sites in terms of providing alternative recreational space.</p>
Option D	Garden Village / Health Promotion – protect all publicly accessible open space; provide lower density, mixed use housing developments with more on-site open space and residential services.	<p>All growth in the WLP has the potential to have a LSE upon habitats sites (sites and pathways of impact are set out in the main HRA report) and areas of functionally linked land. This option would protect all publicly accessible open space. Open green space provides alternative areas of recreational space (as an alternative to designated sites – such as habitats sites). Where public open space is lost it is important to ensure that sufficient recreational resource is provided for the forecast level of growth over the Plan period.</p> <p>All options protect the green belt which is likely to have positive benefits for habitats sites in terms of providing alternative recreational space.</p>
Option E	Minimise Climate Change Impacts – only develop housing in locations with highest sustainable transport access to residential services, and only locate new employment land where there is good public transport access.	<p>All growth in the WLP has the potential to have a LSE upon habitats sites (sites and pathways of impact are set out in the main HRA report) and areas of functionally linked land. By locating housing next to or close to sustainable transport systems, and promoting sustainable transport, this would result in reduced travel and an increase in active travel. This would lead to a knock-on positive impact on air quality and a benefit for habitats sites.</p> <p>All options protect the green belt which is likely to have positive benefits for habitats sites in terms of providing alternative recreational space.</p>
Option F	Infrastructure and Regeneration-Led – Focus development in the central, north and east urban area of Wolverhampton, where development and infrastructure opportunities are concentrated, and regeneration benefits can be maximised.	<p>All growth in the WLP has the potential to have a LSE upon habitats sites (sites and pathways of impact are set out in the main HRA report) and areas of functionally linked land. This option looks to promote sustainable transport, and promoting sustainable transport, this would result in reduced travel and an increase in active travel. This would lead to knock-on impacts which will benefit habitats sites and areas of linking habitat – such as improvements in air quality. The use of brownfield land will reduce development pressure upon undeveloped land. This may in turn safeguard biodiversity resource with knock-on positive impacts for habitats sites and areas of linking habitat.</p> <p>All options protect the green belt which is likely to have positive benefits for habitats sites in terms of providing alternative recreational space.</p>

Spatial Strategy Options	Summary of Plan element	Key HRA related issues for consideration in HRA and plan making process
Option G	<p>Balanced and Sustainable Growth – Focus development in the central, north and east parts of Wolverhampton, to minimise Climate Change impacts, make best use of existing infrastructure and support urban regeneration. Key features: increased housing density in the most accessible locations; more housing in Wolverhampton City Centre.</p>	<p>All growth in the WLP has the potential to have a LSE upon habitats sites (sites and pathways of impact are set out in the main HRA report) and areas of functionally linked land. By locating housing next to or close to sustainable transport systems, and promoting sustainable transport, this would result in reduced travel and an increase in active travel. This would lead to a knock-on positive impact on air quality and a benefit for habitats sites.</p> <p>All options protect the green belt which is likely to have positive benefits for habitats sites in terms of providing alternative recreational space.</p>

The following section of **Appendix C** provides a preliminary screening assessment of policies which have been carried over from the Draft BCP, taking into consideration proposed changes as outlined in Appendix 2 of the Issues and Preferred Options Consultation.

Policy number	Policy name	Justification: Activities that may result in a LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
CSP1	Development Strategy	<p>This policy will set out delivery for new homes and jobs in Wolverhampton.</p> <p>This policy will trigger development and change within the Plan area that could have a LSE on a habitats site.</p> <p>Potential impact pathways:</p> <ul style="list-style-type: none"> <li>Public access and disturbance</li> <li>Air quality</li> <li>Hydrology</li> </ul>	I	Screened in
CSP2	The Strategic Centres and Core Regeneration Areas	<p>This policy will set out development for strategic centres and core regeneration areas.</p> <p>This policy will trigger development and change within the Plan area that could have a LSE on a habitats site.</p> <p>Potential impact pathways:</p> <ul style="list-style-type: none"> <li>Public access and disturbance</li> <li>Air quality</li> <li>Hydrology</li> </ul>	I	Screened in
CSP3	Town and Neighbourhood Areas and the Green Belt	<p>This policy will set out development for towns. Reference to Neighbourhood Areas and the Green Belt will be removed.</p> <p>This policy will trigger development and change within the Plan area that could have a LSE on a habitats site.</p> <p>Potential impact pathways:</p> <ul style="list-style-type: none"> <li>Public access and disturbance</li> <li>Air quality</li> <li>Hydrology</li> </ul>	I	Screened in
CSP5	Cultural Facilities and the Visitor Economy	<p>This policy will set out guiding principles for the achievement of well-designed places.</p> <p>This policy itself would not trigger development or change within the Plan area that could have a LSE on a habitats site.</p>	B	Screened out
GB1	The Black Country Green Belt	<p>This policy will set out protections for the Green Belt. It also sets out design requirements for sites removed from the Green Belt to meet housing, employment, or other need. Reference to Neighbourhood Areas will be removed.</p>	F	Screened out

Policy number	Policy name	Justification: Activities that may result in a LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
		This policy itself would not trigger development or change within the Plan area that could have a LSE at a habitats site.		

### Health and Wellbeing

Policy number	Policy name	Justification: Activities that may result in a LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
HW1	Health and Wellbeing	This policy will set out measures to protect and improve the physical and mental health and wellbeing of its residents. It provides general statements / aspirations required to achieve this. The policy would not trigger development or change within the Plan area that could have a LSE on a habitats site.	A	Screened out
HW3	Health Impact Assessment	This policy will set out the requirements for development proposals to undertake Health Impact Assessments. It would not trigger development or change within the Plan area that could have a LSE on a habitats site.	F	Screened out

### Housing

Policy number	Policy name	Justification: Activities that may result in a LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
HOU1	Delivering Sustainable Housing Growth	This policy will identify a quantum of new homes for the Plan area over the Plan period. Potential impact pathways: <ul style="list-style-type: none"> <li>Public access and disturbance</li> <li>Air quality</li> <li>Hydrology</li> </ul> This policy will make provision for development which may have a LSE upon a habitats site and therefore has been preliminary screened in under Category I. Detailed commentary on individual allocations is provided in Appendix D.	I	Screened in

Policy number	Policy name	Justification: Activities that may result in a LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
HOU3	Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing	This policy will set out requirements to deliver affordable housing, meet wheelchair accessibility standards and requirements in terms of custom build housing. The policy itself would not trigger development or change within the Plan area that could have a LSE on a habitats site.	F	Screened out
HOU4	Accommodation for Gypsies and Travellers and Travelling Showpeople	This policy will set out the requirements to deliver accommodation for gypsies, travellers and travelling showpeople. Detailed commentary on individual allocations is provided in <b>Appendix D</b> . Whilst individually the carried forward and new allocations for gypsy and traveller sites are small, cumulatively, with the rest of development set out in the WLP, and when considered in-combination with other plans and projects, potential impact pathways are as follows: <ul style="list-style-type: none"> <li>• Public access and disturbance</li> <li>• Air quality</li> <li>• Hydrology and water quality</li> </ul> This policy will make provision for development which has the potential to have a LSE upon a habitats site in-combination with other policies within the WLP and other plans and projects. It has been screened in under Category L.	L	Screened in

## Employment

Policy number	Policy name	Justification: Activities that may result in a LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
EMP1	Providing for Economic Growth and Jobs	This policy will relate to the provision of employment land within the Plan area. Detailed commentary on individual allocations is provided in <b>Appendix D</b> . Potential in-combination impact pathways include: <ul style="list-style-type: none"> <li>• Air quality</li> <li>• Hydrology and water quality</li> </ul>	L	Screened in



Policy number	Policy name	Justification: Activities that may result in a LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
		This policy will make provision for development which may have a LSE upon a habitat designated site and therefore has been screened in under Category L.		
EMP4	Other Employment Sites	<p>This policy will relate to the provision of other employment sites which will be protected from other types of development. Detailed commentary on individual allocations is provided in <b>Appendix D</b>.</p> <p>Potential in-combination impact pathways include:</p> <ul style="list-style-type: none"> <li>• Air quality</li> <li>• Hydrology and water quality</li> </ul> <p>This policy will make provision for development which may have a LSE upon a habitat site and therefore has been screened in under Category L.</p>	L	Screened in
EMP5	Improving Access to the Labour Market	<p>This policy will focus on creating job opportunities which benefit residents within Wolverhampton and opportunities / provisions to allow residents to access job opportunities.</p> <p>This policy itself would not trigger development or change within the Plan area that could have a LSE at a habitats site.</p>	F	Screened out

### Centres

Policy Number	Policy name	Justification: Activities that may result in an LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
CEN1	Black Country Centres	<p>This policy will set out the overall priorities/strategy for centres, defines the hierarchy of centres and sets out relevant policy requirements.</p> <p>This policy itself would not trigger development or change within the Plan area that could have a LSE on a habitats site.</p>	B	Screened out
CEN2	Strategic Centres	<p>This policy will set out the role of the strategic centres and relevant policy requirements.</p>	B	Screened out

Policy Number	Policy name	Justification: Activities that may result in an LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
		This policy itself would not trigger development or change within the Plan area that could have a LSE on a habitats site.		

## Transport

Policy number	Policy name	Justification: Activities that may result in a LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
TRAN1	Priorities for the Development of the Transport Network	<p>This policy will set out measures to safeguard land required for priority transport projects (identifying these projects). It will also set out the requirements for all development in terms of active travel and public transport.</p> <p>Potential in-combination impact pathways include:</p> <ul style="list-style-type: none"> <li>• Air quality</li> <li>• Hydrology and water quality</li> </ul> <p>Infrastructure projects which are an inevitable consequence of the WLP – but which are not proposed directly by the WLP itself - will be considered in the HRA in-combination assessment. It is noted that they will be subject to their own HRA through the West Midlands Strategic Transport Plan planning process.</p>	L	Screened in
TRAN2	Safeguarding the Development of the Key Route Network	<p>This policy will set out provisions to safeguard the key route network.</p> <p>This policy itself would not trigger development or change within the Plan area that could have a LSE on a habitats site.</p>	F	Screened out
TRAN4	The Efficient Movement of Freight	<p>This policy will set out the requirements for the efficient movement of freight including encouraging sustainable modes of transport.</p> <p>This policy itself would not trigger development or change within the Plan area that could have a LSE on a habitats site.</p>	F	Screened out
TRAN6	Influencing the Demand for Travel and Travel Choices	<p>This policy will promote sustainable travel choices.</p> <p>This policy itself would not trigger development or change within the Plan area that could have a LSE on a habitats site.</p>	F	Screened out
TRAN7	Parking Management	<p>This policy will encourage sustainable modes of transport through parking standards.</p>	F	Screened out

Policy number	Policy name	Justification: Activities that may result in a LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
		This policy itself will not trigger development or change within the Plan area that could have a LSE on a habitats site.		

### Environment Transformation and Climate Change

Policy Number	Policy name	Justification: Activities that may result in a LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
ENV1	Nature Conservation	Although this policy provides protection to habitat sites and other biodiversity designations, its purpose for inclusion is not specifically intended to provide mitigation at a particular habitat site. This policy would not have a LSE on the qualifying features of a habitats site.	D	Inclusion of a Green and Blue Infrastructure policy may strengthen protection of nature conservation. This could be woven into strategic policies and allocation wording. Please note that compensation, in terms of the Habitats Regulations, can only be considered where there are imperative reasons of overriding public interest (IROPI).
ENV2	Development Affecting Special Areas of Conservation (SACs)	This policy is intended to avoid or reduce harm at Cannock Chase SAC specifically. In light of the ruling in People Over Wind this policy cannot be taken into account in the formal screening decision and must therefore be screened in for further consideration as part of the HRA Appropriate Assessment.	M	Screened in. The outputs of the HRA process will shape this and any other policy requirements in terms of habitat sites – these may relate to water quality, air quality and public access and disturbance.
ENV3	Nature Recovery Network and Biodiversity Net Gain	This policy will set out the requirements for incorporation of development with the Black Country Nature Recovery Network Strategy and Biodiversity Net Gain. This policy does not trigger development and would not have a LSE on the qualifying features of a habitat designated site.	D	CIEEM provides useful guidance in relation to Biodiversity Net Gain <sup>2</sup> . The WLP may benefit from incorporation of a policy on Green and Blue Infrastructure. This could be integrated to sustainable development policies and other policies where ecosystem services can be provided. Green and Blue Infrastructure could actively contribute towards and work alongside mandatory Biodiversity Net Gain, future environmental net gain requirements, and be underpinned by the Black Country Nature Recovery Network Strategy. The Wildlife Trusts have provided advice on how Nature Recovery Networks can be embedded into

<sup>2</sup> CIEEM. 2016. Biodiversity Net Gain. Good Practice Principles. Available at: <https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development/> [Date Accessed: 2711/23]

Policy Number	Policy name	Justification: Activities that may result in a LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
				Local Plans <sup>3</sup> . In addition, the Wildlife Trusts (Gloucestershire Wildlife Trust) has developed a building with nature standard which is an accreditation scheme designed to enable developers to go beyond minimum standards <sup>4</sup> .
ENV8	Open Space, Sport and Recreation	This policy will make provisions for the retention and extension of open space, sport and recreation provision which has potential to divert recreational pressure away from internationally designated sites. This policy itself will not trigger development or change within the Plan area but relates to the design of new development. This policy would not have a LSE on the qualifying features of a European designated site.	D	Screened out
CC1	Increasing efficiency and resilience	This policy sets out design requirements to mitigate climate change impacts. This policy itself will not trigger development or change within the Plan area. This policy would not have a LSE on the qualifying features of a European designated site.	D	Screened out. The BCAs may wish to consider inclusion of water efficiency targets into this policy to support water efficiency requirements in new builds. New developments should be designed to reduce water usage by incorporating water-efficient devices from the outset.
CC5	Flood Risk	This policy sets out the requirements for development to take into consideration the risk of flooding and protect groundwater protection zones. This policy itself will not trigger development or change within the Plan area. This policy would not have a LSE on the qualifying features of a European designated site.	D	Screened out. It is important to protect water quality, both at groundwater and surface water receptors. Deterioration of water quality may be caused by run off from roads and development and through increased discharges from Wastewater Treatment Works (WwTWs).
CC5	Flood Risk	This policy sets out the requirements for development to take into consideration the risk of flooding and protect groundwater protection zones. This policy itself will not trigger development or change within the Plan area.	D	Screened out

<sup>3</sup> The Wildlife Trusts. 2020. Nature Recovery Network Handbook. Available at: [https://www.wildlifetrusts.org/sites/default/files/2020-10/Nature\\_Recovery\\_Network\\_Handbook\\_LO\\_SINGLES.pdf](https://www.wildlifetrusts.org/sites/default/files/2020-10/Nature_Recovery_Network_Handbook_LO_SINGLES.pdf) [Date Accessed: 27/11/23]

<sup>4</sup> Building with Nature. Available at: <https://www.buildingwithnature.org.uk/about> [Date Accessed: 27/11/23]

Policy Number	Policy name	Justification: Activities that may result in a LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
		This policy would not have a LSE on the qualifying features of a habitats site. A new policy on water quality will be incorporated in this section of the WLP alongside CC5 Flood Risk, to address current River Basin Management Plan and Water Framework Directive priorities relevant to the Wolverhampton area. This will be supported by updated water cycle study evidence as required.		
CC7	Renewable and Low Carbon Energy and BREEAM Standards	This policy will set out design requirements in relation to renewable, low carbon energy and BREEAM Standards. This policy itself will not trigger development or change within the Plan area but relates to the design of new development. This policy would not have a LSE on the qualifying features of a habitat designated site.	D	Screened out

### Waste

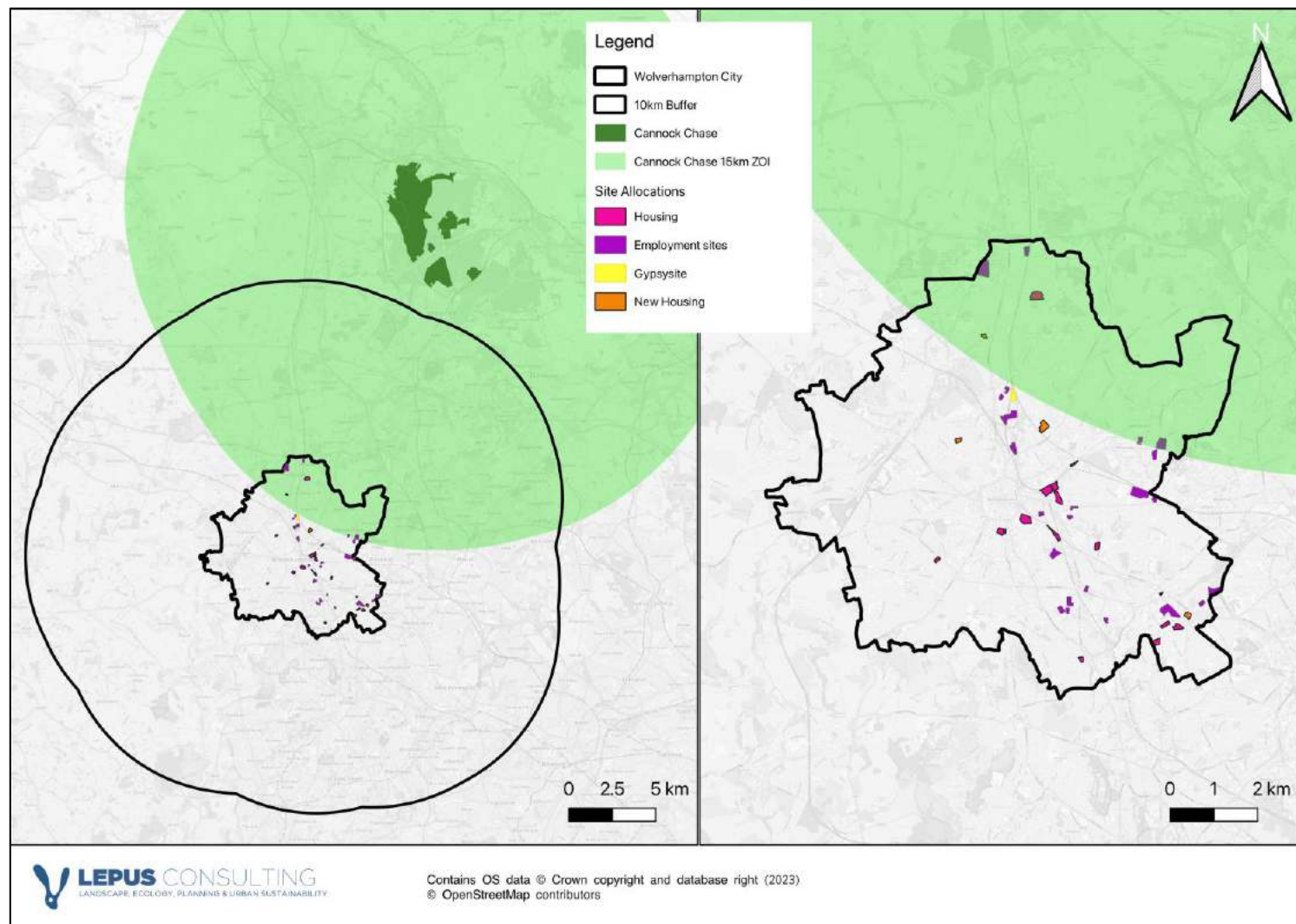
Policy number	Policy name	Justification: Activities that may result in a LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
W1	Waste Infrastructure – future requirements	This policy will set out the overall strategy and principles for waste management in Wolverhampton and the types of waste development that will support this. Whilst the policy will not identify specific locations for new waste facilities it will set out capacity requirements in the justification text which will need to be met over the Plan period.	I	Screened in

### Minerals

Policy number	Policy name	Justification: Activities that may result in a LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
MIN1	Minerals Production - Requirements	This policy will identify the requirements for production of aggregate minerals and industrial minerals in Wolverhampton over the Plan period. Whilst the policy will not identify specific locations for new waste facilities it does set out capacity requirements in the justification text which will need to be met over the Plan period.	I	Screened in

Policy number	Policy name	Justification: Activities that may result in a LSE on a habitats site	Preliminary screening category	Preliminary HRA screening
MIN2	Minerals Safeguarding	This policy will set out how the most important mineral resources in the Plan area, and sites that are expected to be producing, processing or transporting minerals and mineral products, will be protected from other types of development that could compromise their continued operation over the Plan period. These existing mineral extractions have the potential to have in-combination effects with new extraction sites (policy MIN3) and result in potential LSEs on a habitats site.	L	Screened in
MIN4	Managing the Effects of Mineral Development	This policy will set out the requirements that planning applications for mineral working and minerals infrastructure will be expected to address. Of particular note is the requirement for proposals to address the impact of transporting minerals. The transportation of minerals has the potential to have air quality LSEs at habitats sites, and as such this policy will be screened into the HRA process for further consideration.	I	Screened in.

# Appendix D: WLP preliminary allocation screening evaluation



**Figure D.1:** Issues and Preferred Options WLP allocations location map



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## Table Notes:

**Air Quality LSEs:** All site allocations set out in the Issues and Preferred Options WLP have the potential to act cumulatively and in-combination with other plans and projects (see **Appendix A**) to increase traffic flows on the local and wider road network. An increase in traffic related emissions has the potential to change air quality at habitats sites. Applying Natural England's screening thresholds, air quality likely significant effects (LSEs) are considered possible at Fens Pools SAC and Cannock Extension Canal SAC. As growth at all allocations (listed below) contribute towards a change in air quality, all allocations below have been screened in under Category L.

**Water Quality and Quantity LSEs:** All site allocations set out in the Issues and Preferred Options WLP (including those listed below) have the potential to act cumulatively with one another and in-combination with other plans and projects to increase the quantity of water required for treatment at Wastewater Treatment Works (WWTWs). This may result in the deterioration of downstream water quality. In addition, new development set out in the Issues and Preferred Options WLP will increase demand for water supply which may also affect water levels at hydrologically sensitive Habitats sites. Taking a precautionary approach, hydrology impacts from the combined effect of all developments together, acting in-combination with other plans and projects (see **Appendix A**), have the potential to result in LSEs at hydrologically connected habitats sites listed in **Table 3.3** of the Regulation 18 HRA report. Water quality and quantity impacts at all allocations listed below have therefore been screened in under Category L.

**Table D.1** screens recreation LSEs associated with each potential allocation through reference to the location of each allocation in relation to the Cannock Chase SAC recreational Zone of Influence (ZOI). As no habitat sites are located within the Plan area it is unlikely that there will be any urbanisation LSEs.

**Table D.1:** Preliminary screening evaluation of potential sites allocations (recreational LSEs only)

**Stafford Road Core Regeneration Area**

WLP site reference (Draft BCP ref)	Site name	Allocation details (employment/ residential/ mixed)	Does the site allocate residential development within the Cannock Chase SAC ZOI?
H1	Bluebird Industrial Estate and site to rear, Park Lane	Housing – 130 units	No
GT1 (GT06)	Former Bushbury Reservoir, Showell Road	Gypsy and traveller pitches (G) – 12 Pitches	No
E1 (WOE725)	Wolverhampton Business Park	Employment	No
E2 (WOE684)	Rear of IMI Marstons, Wobaston Road	Employment	No
E3 (WOE690)	Shaw Road	Employment	No
E4 (WOE758)	Former Strykers, Bushbury Lane	Employment	No
E5 (WOE723)	Gas Holder site, Wolverhampton Science Park	Employment	No
E6 (WOE727)	Mammoth Drive, Wolverhampton Science Park	Employment	No
E7 (WOE726)	Stratosphere Site, Wolverhampton Science Park	Employment	No
E8 (WOE681)	Cross Street North / Crown Street	Employment	No

**Wednesfield Core Regeneration Area**

WLP sitereference (Draft BCP ref)	Site name	Allocation details (employment/ residential/ mixed)	Does the site allocate residential development within the Cannock Chase SAC ZOI?
H2 (H183)	Former G & P Batteries, Grove Street, Heath Town	Housing - 56 units	No
H3 (H186)	East of Qualcast Road	Housing - 101 units	No
H4 (H187)	West of Qualcast Road	Housing – 119 units	No
H5 (H188)	West of Colliery Road	Housing - 90 units	No
E9 (WOE729)	Bentley Bridge Business Park, Well Lane, Wednesfield	Employment	No
E10 (WOE618)	Tata Steel, Wednesfield	Employment	No
E11 (WOE698)	Phoenix Road, Wednesfield	Employment	No
E12 (WOE703)	Land at Neachells Lane	Employment	No
E13 (WOE694)	Land rear Keyline Builders, Neachells Lane / Noose Lane	Employment	No

### Bilston Core Regeneration Area

WLP site reference (Draft BCP ref)	Site name	Allocation details (employment/ residential/ mixed)	Does the site allocate residential development within the Cannock Chase SAC ZOI?
H6 (H196)	Dobbs Street, Blakenhall	Housing - 266 units	No
H7 (H192)	Dudley Road / Bell Place, Blakenhall	Housing - 100 units	No
H8 (H182)	Former Royal Hospital, All Saints	Housing - 192 units	No
H9 (H189)	Delta Trading Estate, Bilston Road	Housing - 80 units	No
H10 (H195)	Land at Hall Street / The Orchard, Bilston Town Centre	Housing - 21 units	No
H11 (H197)	Former Pipe Hall, The Orchard, Bilston Town Centre	Housing - 38 units	No
H12 (H272)	Lane Street / Highfields Road, Bradley	Housing - 72 units	No
H13 (H190)	Greenway Road, Bradley	Housing - 180 units	No
H14	Former Loxdale Primary School, Chapel Street, Bradley	Housing - 100 units	No
H15 (H191)	South of Oxford Street, Bilston	Housing - 20 units	No
E14 (WOE761)	Chillington Fields	Employment	No
E15 (WOE759)	Powerhouse, Commercial Road	Employment	No
E16 (WOE754)	Hickman Avenue	Employment	No
E17 (WOE662)	Former MEB Site, Major Street / Dixon Street	Employment	No
E18 (WOE658)	Millfields Road, Ettingshall	Employment	No
E19 (WOE755)	Rolls Royce Playing Field, Spring Road	Employment	No
E20 (WOE757)	South of Inverclyde Drive	Employment	No
E21 (WOE760)	Rear of Spring Road	Employment	No
E22 (WOE734)	Springvale Avenue	Employment	No
E23 (WOE737)	Bilston Urban Village, Bath Street	Employment	No
E24 (WOE763)	Dale St, Bilston	Employment	No
E25 (WOE735)	South of Citadel Junction, Murdoch Road, Bilston	Employment	No

### Neighbourhoods Area

WLP site reference (Draft BCP ref)	Site name	Allocation details (employment/ residential/ mixed)	Does the site allocate residential development within the Cannock Chase SAC ZOI?
H16 (H199)	Former Northcote Secondary School, Northwood Park Road	Housing – 178 units	Yes
H17 (H198)	Beckminster House, Beckminster Road	Housing – 15 units	No
H18 (H184)	Former Rookery Lodge, Woodcross Lane	Housing – 16 units	No
H19 (H201/ H202)	Former Stowheath Centres, Stowheath Lane	Housing – 53 units	No
H20	Former Probert Court / Health Centre, Probert Road	Housing – 35 units	Yes
H21	Former Gym, Craddock Street	Housing – 48 units	No

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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