

HRA of the Telford and Wrekin Regulation 19 Local Plan

Telford and Wrekin Council

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Quality information

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HRA of the Telford and Wrekin Regulation 19 Local Plan

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Table of Contents

1.	Introduction	1
Backgro	und to the Project	1
Legislati	on	1
Scope of	f the Project	2
2.	Methodology	4
Introduct	tion	4
Descripti	ion of HRA Tasks	4
HRA Tas	sk 1 – Screening for Likely Significant Effects (LSEs)	4
HRA Tas	sk 2 – Appropriate Assessment (AA)	4
	sk 3 – Avoidance and Mitigation	
'In Comb	pination' Assessment	6
3.	Test of Likely Significant Effects	3
Introduct	tion	6
Habitats	Sites for Consideration	7
Recreati	onal Pressure including from Urbanisation	8
Increase	ed Water Demand and Impact on Water Quality1	0
Atmosph	neric Pollution 1	1
4.	Appropriate Assessment14	4
Water De	emand and Impact of Water Quality1	4
5.	In Combination Effects	6
6.	Conclusions & Recommendations	6
Appen	dix A LSEs Screening	3
Docum	nent copies	6

Figures

Figure 1: The legislative basis for Appropriate Assessment	. 1
Figure 2: Four Stage Approach to Habitats Regulations Assessment. Source EC, 2001 ¹	. 4
Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT)	13

Tables

Table 1: Main sources and effects of air pollutants on habitats and species 1	11
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1. Introduction

Background to the Project

- 1.1 AECOM was appointed by Telford & Wrekin Council to produce a Habitats Regulations Assessment (HRA) of the Regulation 19 Telford and Wrekin Local Plan (hereafter referred to as the Local Plan or 'Plan'). The objectives of the assessment are to:
 - Identify any aspects of the Local Plan that would cause any adverse effect on the integrity of Natura 2000 sites, otherwise known as Habitats sites (previously "European sites") (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government Policy, Ramsar Sites), either in isolation or in combination with other plans and projects; and,
 - To advise on appropriate policy mechanism for delivering mitigation where such effects were identified.
- 1.2 This assessment is of the Regulation 19 update of HRA.

Legislation

- 1.3 The UK left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). While the UK is no longer a member of the EU, a requirement for Habitats Regulations Assessment continues as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019¹.
- 1.4 The HRA process applies the 'Precautionary Principle'² to Habitats sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the Habitats site(s) in question. To ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the Plan or project in question. Figure 1 below sets out the legislative basis for Appropriate Assessment.
- 1.5 Plans and projects that are associated with potential adverse impacts on Habitats sites may still be permitted if there are no reasonable alternatives and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

"A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site".

Figure 1: The legislative basis for Appropriate Assessment

1.6 Over time the phrase 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Regulations from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an 'Appropriate Assessment'.

¹ These don't replace the 2017 Regulations but are just another set of amendments.

² The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: *"When human activities may lead to morally unacceptable harm* [to the environment] *that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis".*

1.7 In spring 2018 the 'Sweetman' European Court of Justice ruling³ clarified that 'mitigation' (i.e. measures that are specifically introduced to avoid or reduce a harmful effect on a Habitats site that would otherwise arise) should **not** be taken into account when forming a view on Likely Significant Effects. Mitigation should instead only be considered at the Appropriate Assessment stage. This HRA is cognisant of that ruling.

Scope of the Project

- 1.8 There is no pre-defined guidance that dictates the physical scope of an HRA of a Local Plan document. Therefore, in considering the physical scope of the assessment, we were guided primarily by the identified impact pathways (called the source-pathway-receptor model) including work undertaken for the HRA of the adopted Local Plan.
- 1.9 Briefly defined, impact pathways are routes by which the implementation of a policy within a Local Plan document can lead to an effect upon a Habitats site. An example of this would be new residential development resulting in an increased population and thus increased recreational pressure, which could then affect Habitats sites by, for example, disturbance of non-breeding or breeding birds. Guidance from the Ministry of Housing, Communities and Local Government (MHCLG) states that the HRA should be 'proportionate to the geographical scope of the [plan policy]' and that 'an AA need not be done in any more detail, or using more resources, than is useful for its purpose' (MHCLG, 2006, p.6).
- 1.10 This basic principle has also been reflected in court rulings. The Court of Appeal⁴ has ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be 'achieved in practice' to satisfy that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Core Strategy document)⁵. In this case the High Court ruled that for 'a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of Reg 61 of the Habitats Regulations'.
- 1.11 Given an initial assessment of the relevant Habitats sites and the impact pathways present, and referring to the HRA work that was undertaken for the adopted Local Plan, this HRA considers likely significant effects on the following Habitats sites:
 - Aqualate Mere, Cop Mere and Hencott Wood and Hencott Pool (Midlands Meres and Mosses Phase 2 Ramsar site) – Aqualate Mere is approximately 0.4 km east of the borough, east of Meretown and Forton. Cop Mere is approximately 7.7km north east of the borough, north east of Walk Mill and Offleyhay. Hencott wood and Hencott Pool is approximately 5.9 km west of the borough, north west of Shrewsbury.
 - Bomere Wood, Bomere Pool and Shomere Pool and Berrington Pool (Midland Meres and Mosses Phase 1 Ramsar site) Bomere Wood and Pool and Shomere Pool is approximately 8.2 km south west of the borough, south east of Shrewsbury. Berrington Pool is approximately 6.8 km south west of the borough, north west of Berrington Village.
 - Mottey Meadows SAC approximately 5.2 km east of the borough, west of the village of Wheaton Aston.
 - Cannock Chase SAC approximately 19 km east of the borough, south east of Stafford.
 - West Midland Mosses SAC Clarepool and Hampton Moss is approximately 20km north west of the borough. Wybunbury Moss is approximately 24km north of the borough. Chartley Moss is approximately 25.5km north east of the borough.
 - Severn Estuary SAC/SPA/Ramsar is approximately 95km south of the borough.
- 1.12 This scope is identical for that of the HRA of the adopted Local Plan. Note that this does not mean it is considered that potential for likely significant effects on these sites necessarily exists, but simply that these

³ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

⁴No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015 ⁵High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

are the sites that will be investigated. No potential pathways of impact have been identified linking to other Habitats sites.

2. Methodology

Introduction

- 2.1 The HRA has been carried out with reference to the general EC guidance on HRA⁶ and general guidance on HRA published by government in July 2019 and February 2021⁷. AECOM has also been mindful of the implications of European case law in 2018, notably the Holohan ruling and the People over Wind ruling, both discussed below.
- 2.2 Figure 2 below outlines the stages of HRA according to current EC guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the Plan.

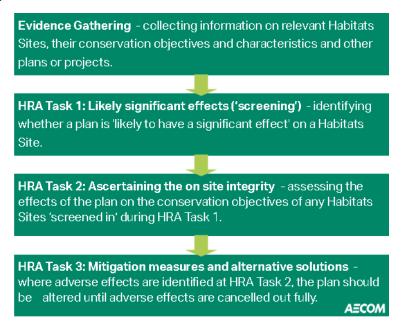


Figure 2: Four Stage Approach to Habitats Regulations Assessment. Source EC, 2001¹.

Description of HRA Tasks

HRA Task 1 – Screening for Likely Significant Effects (LSEs)

2.3 Following evidence gathering, the first stage of any Habitats Regulations Assessment is the screening for Likely Significant Effects (LSEs), essentially a high-level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European [Habitats] sites?"

2.4 The objective is to filter out those Plans and projects that can, without any detailed appraisal, be concluded to be unlikely to result in any impacts upon Habitats sites, usually because there is no mechanism for a negative interaction. This stage is undertaken in Chapter 4 of this report and in Appendix A.

HRA Task 2 – Appropriate Assessment (AA)

2.5 Where it is determined that a conclusion of 'no Likely Significant Effects (LSEs)' cannot be drawn, the analysis proceeds to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'Appropriate Assessment' is not a technical term. In other words, there are no particular technical analyses,

⁶ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁷ <u>https://www.gov.uk/guidance/appropriate-assessment</u> and <u>https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site</u>

or level of technical analysis, that are classified by law as belonging to Appropriate Assessment compared to the screening stage.

- 2.6 By virtue of the fact that it follows screening for LSEs, there is a clear implication that the analysis will be more detailed than undertaken at the previous stage. One of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the Appropriate Assessment would take any policies or allocations that could not be dismissed following the high-level screening and assess the potential for an effect in more detail, with a view to concluding whether there would be a potential for an adverse effect on site integrity (in other words, disruption of the coherent structure and function of the Habitats site(s)). A decision by the European Court of Justice⁸ concluded that measures intended to avoid or reduce the harmful effects of a proposed Plan or project on a Habitats site may no longer be considered by competent authorities at the screening for LSEs stage of HRA. That ruling has been taken into account in producing this HRA.
- 2.7 Also. in 2018 the Holohan ruling⁹ was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that 'As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area' [emphasis added]. Due account of this decision has been given in this HRA in relation to the Ashdown Forest SPA, which is designated for mobile ground-nesting birds (although it is to be noted that the qualifying species are not considered to be critically dependent on functionally linked habitats).

HRA Task 3 – Avoidance and Mitigation

- 2.8 Where necessary, measures are recommended for incorporation into the Plan in order to mitigate and / or avoid adverse effects on Habitats sites. There is considerable precedent concerning the level of detail that a Local Plan document needs to contain regarding mitigation for impact pathways on Habitats sites (e.g. regarding recreational pressure). The implication of this precedent is that it is not necessary for all measures to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.
- 2.9 When discussing mitigation for a Local Plan, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since a Local Plan document is a high-level policy document.
- 2.10 In any Local Plan, there are numerous policies for which there is a limit to the degree of assessment that is possible at the Plan level. This is because either:
 - The policy in question does not contain any specifics as to what will be delivered or where, and so
 cannot be assessed in detail at the Plan level. In these cases, the Appropriate Assessment
 focusses on precautionary mitigation that can be included in the plan to ensure that whatever
 proposals come forward will not result in adverse effects on integrity; or
 - The nature of potential impacts (e.g. visual and noise disturbance arising from construction or loss of functionally linked habitat) are related to how the development will be designed and constructed, and therefore cannot be assessed in detail at the plan level. In these instances, the Appropriate Assessment focusses on available mitigation measures, the extent to which such measures would be achievable and effective, and whether an adequate protective framework exists to ensure that the policy would not lead to an adverse effect on the integrity of any internationally designated sites.
- 2.11 In these instances, the advice of Advocate-General Kokott¹⁰ is also worth considering. She commented that: 'It would ...hardly be proper to require a greater level of detail in preceding plans [rather than planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the

⁸ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

⁹ Case C-461/17

¹⁰ Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland, paragraph

⁴⁹http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN

basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure' [emphasis added].

'In Combination' Assessment

- 2.12 It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and project that may also be affecting the Habitats site(s) in question.
- 2.13 For the purposes of this assessment we have determined that, due to the nature of the identified impacts, the other plans and project with potential for in-combination likely significant effects are those that can result in recreational pressure, loss of supporting habitats, reduced air quality, reduced water quality, or increased demand for water resources.
- 2.14 For the purpose of this assessment the following documents will be considered in-combination with the Local Plan:
 - Shropshire Emerging Local Plan Review 2016 2038
 - Stafford Borough Local Plan 2020 2040
 - South Staffordshire District Local Plan Review (
 - Newcastle-under-lyme Borough Council Local Plan 2020 2040 (
 - Stoke-on-Trent Local Plan
 - Oswestry Town Plan 2020
 - Shrewsbury Big Town Plan 2018
 - Severn Trent Water Resources Management Plan (2024)
 - Telford and Wrekin Local Transport Plan 2011 2026
- 2.15 This list of plans has been devised through an understanding of local authority connections around Telford & Wrekin.
- 2.16 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plan which in themselves have minor impacts are not simply dismissed on that basis but are evaluated for any significant cumulative contribution they may make to an overall significant effect.

3. Test of Likely Significant Effects

3.1 This stage of the HRA assesses all policies in the Local Plan for impact pathways linking to Habitats sites. The screening assessments of all policies contained in the plan are also provided in Appendix A.

Introduction

- 3.2 In carrying out an HRA it is important to determine the various ways in which land use plan can impact on Habitats sites by following the pathways along which development can be connected with Habitats sites, in some cases many kilometres distant. Briefly defined, pathways are routes by which a change in activity associated with a development can lead to an effect upon a Habitats site.
- 3.3 In determining pathway-receptor potential for impacts of the Local Plan on Habitats sites, the following data sources have been interrogated:
 - The UK Air Pollution Information System (<u>www.apis.ac.uk</u>);

- Visitor studies for relevant Habitats designated sites, where available, notably those undertaken for Cannock Chase SAC:
- Multi-Agency Geographic Information for the Countryside (MAGIC) website (www.magic.defra.gov.uk) and its links to SSSI citations (www.naturalengland.org.uk) and the JNCC website (www.jncc.gov.uk); and
- Habitats Regulations Assessments of surrounding Local Plans, where available and appropriate to use.

Habitats Sites for Consideration

- 3.4 AECOM uses a minimum precautionary buffer of 10km outside of the borough boundary when first considering which Habitats sites need assessing within the HRA. However, Habitats sites further afield are also considered where there may be linking impact pathways to development within the borough; for example, a Habitats site with a recreational catchment larger than 10km or abstraction and transfer licences.
- 3.5 The HRA for the Adopted Local Plan considered several Habitats sites outside of this precautionary 10km buffer:
 - Severn Estuary SAC/SPA/Ramsar site;
 - West Midland Mosses SAC; and,
 - Cannock Chase SAC.
- 3.6 Cannock Chase is a large site which is popular with recreational users. Extensive visitor survey work has been undertaken for this SAC¹¹ which has identified that only net new housing within 15km of the Habitats site will result in a significant increase in recreational pressure. Telford & Wrekin lies considerably further than this distance (approximately 19km at its closest). There are no hydrological connections between the Habitats site and the borough and the average vehicle journey in the UK is approximately 10.6km¹². Therefore, traffic generated within the borough will have dispersed across the network at the distance between the borough boundary and the Habitats site.
- 3.7 The Severn Estuary SAC/SPA/Ramsar site covers an area of approximately 74,000 ha and is one of the best areas in the UK to support significant numbers notable species and habitats. It is an extremely popular area for recreation including walking, dog walking, horse riding, biking, beach activities, angling and other water sports. Visitor surveys have been conducted for this Habitats site¹³, which has identified that only net new housing within 7.7km of the Habitats sites will result in an increase in recreational pressure. Telford & Wrekin lies approximately 90km north of the Habitats sites at its closest. Therefore, an increase in development in Telford & Wrekin will not directly impact the Habitats site. The River Severn skims the southern boundary of Telford & Wrekin borough through Ironbridge and Coalport and wastewater treatment works that serve Telford & Wrekin discharge to the River Severn; typically, the Environment Agency would not consider even large wastewater treatment works located at 90km distance from an SAC as likely to have an adverse effect on water quality in that SAC.
- 3.8 West Midlands Mosses SAC is vulnerable to water pollution, hydrological changes, air pollution and habitat fragmentation. However, West Midlands Mosses SAC components have no hydrological connections to the borough. As the components are outside of the borough development does not pose a threat of fragmenting the habitats and the closest component of the SAC is approximately 20km north west of the borough; therefore any increase in vehicles on the roads within the borough will be highly dispersed at the distance between the borough boundary and the Habitats site. The SAC is also considered to be well outside the core recreational catchment of even the most visitor-popular Habitats site in the broad area (Cannock Chase SAC).
- 3.9 The HRA of the Local Plan has considered all the Habitats sites above but focuses on the following Habitats sites:

¹¹ https://www.lichfielddc.gov.uk/downloads/file/634/cannock-chase-special-area-of-conservation-visitor-survey [Accessed 02

July 2020] ¹² GOV.UK (2019). Average number of trips made and distance travelled. <u>https://www.gov.uk/government/statistical-data-</u> sets/nts01-average-number-of-trips-made-and-distance-travelled, accessed 13/03/2020

¹³ <u>http://www.epr.uk.com/assets/severnestuaryreport.pdf</u> [Access 03 July 2020]

- Midlands Meres and Mosses Phase 1 Ramsar site;
- Midlands Meres and Mosses Phase 2 Ramsar site; and,
- Mottey Meadows SAC.
- 3.10 The assessment will focus on the following impact pathways.

Recreational Pressure including from Urbanisation

- 3.11 Recreational use of a Habitats site has the potential to:
 - · Prevent appropriate management or exacerbate existing management difficulties;
 - Cause damage through erosion and fragmentation; and
 - Cause eutrophication as a result of dog fouling.
- 3.12 Different types of internationally designated sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.
- 3.13 Most types of land based internationally designated site can be affected by trampling, which in turn causes soil compaction and erosion. Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also have potential to cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths and move more erratically. Motorcycle scrambling and off-road vehicle use can cause serious erosion, as well as disturbance to sensitive species.
- 3.14 There have been several papers published that empirically demonstrate that damage to vegetation in woodlands and other habitats can be caused by vehicles, walkers, horses and cyclists:
 - Wilson & Seney (1994)¹⁴ examined the degree of track erosion caused by hikers, motorcycles, horses and cyclists from 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.
 - Cole et al (1995a, b)¹⁵ conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow and grassland communities (each tramped between 0 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphological characteristics were found to explain more variation in response between different vegetation types than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. Cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.
 - Cole (1995c)¹⁶ conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampler weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier tramplers caused a greater reduction in vegetation height than lighter tramplers, but there was no difference in effect on cover.

¹⁴ Wilson, J.P. & J.P. Seney. 1994. Erosional impact of hikers, horses, motorcycles and off road bicycles on mountain trails in Montana. *Mountain Research and Development* 14:77-88

¹⁵ Cole, D.N. 1995a. Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* 32: 203-214

Cole, D.N. 1995b. Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* 32: 215-224

¹⁶ Cole, D.N. (1995c) Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah

- Cole & Spildie (1998)¹⁷ experimentally compared the effects of off-track trampling by hiker and horse (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse traffic was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Higher trampling intensities caused more disturbance.
- 3.15 The total volume of dog faeces deposited on sites can be surprisingly large. For example, at Burnham Beeches National Nature Reserve over one year, Barnard¹⁸ estimated the total amounts of urine and faeces from dogs as 30,000 litres and 60 tonnes respectively.
- 3.16 Urbanisation is closely related to recreational pressure, in that they both result from increased populations within close proximity to sensitive sites. However, urbanisation is only considered an issue when large amounts of development is in very close proximity to sensitive sites. There are no Habitats sites within the boundaries of Telford & Wrekin borough. The closest Habitats site to the boundaries of the borough is the Aqualate Mere SSSI component of Midland Meres and Mosses Phase 2 Ramsar. This Habitats site is approximately 400m from the boundary of the borough. However, the nearest allocated residential development is approximately 800 m away. Therefore, the urbanisation pathway can be scoped out from investigation within the HRA.
- 3.17 With regard to recreational pressure, account has been taken of the specific circumstances of each Habitats site:
 - Although open to the public as a National Nature Reserve, Aqualate Mere's recreational access is restricted to a few public rights of way and a bird hide at the eastern end of the mere; outside of the PRoW and hide the reserve is permit access only and dogs are required to be kept on leads throughout the site; therefore, recreation is managed to an appropriate level.
 - The Cop Mere component of the Ramsar site is used by an angling club for fishing of tench and pike; it is not open to the public as a reserve but does have PRoW around part of the mere behind a strip of woodland.
 - Hencott Wood and Hencott pool do not appear to have any public rights of way through the site.
 - Bomere/Shomere Pool is a privately-owned site, closed to the public, which operates a towed water sports facility on the larger lake, although a PRoW does run close to the northern shore for much if its length. Berrington pool is owned and managed for recreation and conservation by the National Trust. Rangers shut off pathways along the lake close to the heronry during the breeding season but do also have a boating event on the lake during the summer months.
- 3.18 Moreover, sites with meres and bog pools as their primary interest features are generally much less susceptible to conventional recreational pressure as the soft, wet and difficult to traverse nature of the protected habitats deter off-track activity on foot.
- 3.19 While the habitats for which Mottey Meadows SAC is designated are potentially vulnerable to impacts of the Local Plan, the site improvement plan (SIP) does not highlight recreational pressure as an issue and nor does the Supplementary Advice on the Conservation Objectives for the SAC¹⁹. In addition, the site is remote from the population centres of Telford (the closest large settlement being Newport, located more than 9km to the north west).
- 3.20 Overall, AECOM concludes that there will be no LSEs of the Local Plan on the Midlands Meres and Mosses Phase 1 Ramsar site, Midlands Meres and Mosses Phase 2 Ramsar site, Mottey Meadows SAC, Severn Estuary SAC/SPA/Ramsar site, Cannock Chase SAC, or West Midlands Mosses SAC regarding recreational pressure and these sites are screened out for Appropriate Assessment regarding this impact pathway.

¹⁷ Cole, D.N., Spildie, D.R. (1998) Hiker, horse and Ilama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* 53: 61-71

 ¹⁸ Barnard, A. (2003) Getting the Facts - Dog Walking and Visitor Number Surveys at Burnham Beeches and their Implications for the Management Process. *Countryside Recreation*, 11, 16 - 19
 ¹⁹ <u>UK0030051 Mottey Meadows SAC Published 10 Jul 2024</u>

Increased Water Demand and Impact on Water Quality

- 3.21 Telford & Wrekin is supplied drinking water and sewerage services by Severn Trent. Severn Trent is one of the largest of the 17 regulated water companies in England and Wales and provides services to more than 4.3 million households and businesses in the Midlands and Chester and treats around 1.4 billion litres of waste water per day.
- 3.22 The Severn Plan Trent Water Resource Management Summary states that: "a significant deficit will develop between supply and demand for water over the medium term unless we act... the need to prevent the risk of future environmental deterioration, is a fundamental requirement of the Water Framework Directive. This means that in order to protect our environment for future customers, some of our current sources of water cannot be relied upon in the future and we need to find alternative ways of meeting demand"
- 3.23 A third of drinking water supplied by Severn Trent comes from ground water, from a range of sandstone aquifers in the Midlands, Derbyshire and the Cotswolds. The remaining two thirds of water supply comes from rivers and reservoirs in lowland and upland areas like the Peak District. Telford's main water supply comes from groundwater treated at works within Shropshire.
- 3.24 A total of 22 solutions are contained within the WRMP 2024 to address the forecast shortfall in the supplydemand balance over the planning period. These include water transfers, expansions and enhancements of WwTWs, new WwTWs, and increasing reservoir capacity.
- 3.25 All three Habitats sites have potential vulnerabilities to water pollution and hydrological changes. However, the HRA of the WRMP 2019 determined that the demand solutions involve relatively small-scale and temporary activity and are largely concentrated within urban and suburban areas and unlikely to be within close proximity to Habitats sites. The HRA ruled out all but one supply solution as having No Likely Significant Effect on Habitats sites. One transfer solution was taken to Appropriate Assessment. However, it was concluded that the implementation of the solution would not have any adverse effect on the integrity of any Habitats sites in the supply area.
- 3.26 Moreover, all new development will need to be highly water efficient. This can be achieved by designing in water efficiency measures such as low flush toilets, rainwater harvesting and greywater recycling in new development. This will be achieved by Policy CC4: Water re-use, conservation, efficiency and quality.
- 3.27 It is considered that the commitment in Policy CC4: Water re-use, conservation, efficiency and quality, would make it more feasible for Severn Trent to reduce reliance on groundwater abstraction during periods of high demand and/or low flow, this would protect the SAC and Ramsar sites.
- 3.28 All Habitats sites are outside of the borough, the closest being approximately 400m east of the borough up to over 24km and therefore likely to be even further from any development sites. It is unlikely that there are hydrological connections between the Habitats sites and development sites within the borough which are primarily located in or immediately adjacent to existing urban areas.

Three Habitats sites are located within 10km of the Plan Area. These sites have potential vulnerabilities to water pollution and hydrological changes. The primary risk to these sites is surface runoff which is likely to only significantly impact sites within 1km of an allocation. Midlands Meres and Mosses Phase 1 Ramsar is over 10km from the nearest site allocation and Mottley Meadows SAC is over 9km from the nearest site and thus can be excluded at this stage. However, Midlands Meres and Mosses Phase 2 Ramsar site is approximately 1km from the nearest site allocation and therefore cannot be excluded at this stage.

- 3.29 The following policies were screened in for appropriate assessment with regards to their impact on water resources as Likely Significant Effects could not be screened out at this time:
 - Policy S4 Housing delivery strategy
 - Policy EC6 Telford Town Centre
 - Policy HO1 Housing Allocations
 - Policy HO2 Sustainable Communities

- Policy HO8 Gypsy, Traveller and Showpeoples Accommodation .
- 3.30 Overall, AECOM concludes that there will be LSEs of the Local Plan on the Midlands Meres and Mosses Phase 2 Ramsar site regarding water and this site is screened in for Appropriate Assessment regarding this impact pathway.

Atmospheric Pollution

3.31 The main pollutants of concern for Habitats sites are oxides of nitrogen (NOx), ammonia (NH₃) and sulphur dioxide (SO₂) and are summarised in Table 1. Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges²⁰. NOx can also be toxic at very high concentrations (far above the annual average Critical Level). High levels of NOx and NH₃ are likely to increase the total nitrogen (N) deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems. Increases in nitrogen deposition from the atmosphere can, if sufficiently great, enhance soil fertility and lead to eutrophication. This often has adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats^{21 22}.

Table 1: Main sources and effects of air pollutants on habitats and species²³

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO ₂)	The main sources of SO_2 are electricity generation, and industrial and domestic fuel combustion. However, total SO_2 emissions in the UK have decreased substantially since the 1980's. Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of SO_2 have been documented in busy ports. In future years shipping is likely to become one of the most important contributors to SO_2 emissions in the UK.	 Wet and dry deposition of SO₂ acidifies soils and freshwater, and may alter the composition of plant and animal communities. The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species. However, SO₂ background levels have fallen considerably since the 1980's and are now not regarded a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to returning lichen species and improved tree health in London.
Acid deposition	Leads to acidification of soils and freshwater via atmospheric deposition of SO ₂ , NOx, ammonia, and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels.	Gaseous precursors (e.g. SO ₂) can cause direct damage to sensitive vegetation, such as lichen, upon deposition. Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds / plants. Not all sites are equally susceptible to acidification. This varies depending on soil type, bed rock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz rich rocks tend to be more susceptible.
Ammonia (NH ₃)	Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but	The negative effect of NH ₄ + may occur via direct toxicity, when uptake exceeds detoxification capacity and via nitrogen accumulation.

²⁰ <u>http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm.</u>

evidence from a long-term field manipulation. Global Change Biology 17: 3589-3607.

²¹ Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. (2006). Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. *Lichenologist* **38**: 161-176. ²² Dijk, N. (2011). Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions:

²³ Information summarised from the Air Pollution Information System (<u>http://www.apis.ac.uk/</u>).

Pollutant	Source	Effects on habitats and species
	ammonia concentrations are directly related to the distribution of livestock. Ammonia reacts with acid pollutants such as the products of SO ₂ and NO _x emissions to produce fine ammonium (NH ₄ +) - containing aerosol. Due to its significantly longer lifetime, NH ₄ + may be transferred much longer distances (and can therefore be a significant trans-boundary issue). While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type.	Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast- growing and tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen. As emissions mostly occur at ground level in the rural environment and NH ₃ is rapidly deposited, some of the most acute problems of NH ₃ deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides (NO _x)	Nitrogen oxides are mostly produced in combustion processes. Half of NO_X emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes. NOx concentrations have been falling for decades due to improvements in vehicle emissions technology and this will accelerate after 2030 as electric vehicles (or other non-combustion engine vehicles) spread through the vehicle fleet following the the UK government's policy to ban the sale of new petrol and diesel cars and vans by 2035 (recently postponed from 2030). This ban will result in a significant shift in the constitution of the UK vehicle fleet during the 2030s.	Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of NOx for all vegetation types has been set to 30 ug/m3. Deposition of nitrogen compounds (nitrates (NO ₃), nitrogen dioxide (NO ₂) and nitric acid (HNO ₃)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification. In addition, NO _x contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species.
Nitrogen (N) deposition	The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO_x) or reduced (e.g. NH_3) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices. The nitrogen pollutants together are a large contributor to acidification (see above).	All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally. Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from nitrogen eutrophication. This is because many semi-natural plants cannot assimilate the surplus nitrogen as well as many graminoid (grass) species. Nitrogen deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O ₃)	A secondary pollutant generated by photochemical reactions involving NOx, volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above). Increasing anthropogenic emissions of ozone precursors in the UK have led to an increased number of days when ozone levels rise above 40ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O ₃ above 40 ppb can be toxic to both humans and wildlife, and can affect buildings. High O ₃ concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reduction in floral biomass, reduction in crop yield (e.g. cereal grains, tomato, potato), reduction in the number of flowers, decrease in forest production and altered species composition in semi-natural plant communities.

- 3.32 Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping²⁴. As such these will not be associated with Local Plan growth. Ammonia emissions originate from agricultural practices²⁵, with some chemical processes also making notable contributions and traffic also contributing materially at a local scale. NOx emissions are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion of its overall NOx footprint (92%) through associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison²⁶. Therefore, emissions of NOx and ammonia can reasonably be expected to increase as a result of the Plan, primarily due to an increase in the volume of commuter traffic associated with housing growth.
- 3.33 The World Health Organisation has the following critical thresholds for plant communities: The critical NOx concentration (critical level) for the protection of vegetation is 30 µgm⁻³ and the critical level for ammonia 1-3 µgm⁻³ (depending on whether normal vegetation or lichens and bryophytes are involved). Additionally, ecological studies have determined 'Critical Loads'27 of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH₃).
- 3.34 According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roads to local pollution levels is insignificant (Figure 3 and reference ²⁸). Therefore, this distance has been used throughout this HRA to determine whether Likely Significant Effects (LSEs) on sensitive Habitats sites may arise due to implementation of the Plan.

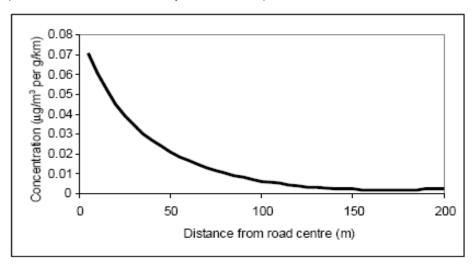


Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: **DfT**²⁹)

- 3.35 Around 16,345 people commute from Telford and Wrekin borough either as drivers or passengers in a car or van to their place of work outside of the borough and around 20,981 people commute from the surrounding boroughs and counties into Telford and Wrekin borough for work³⁰.
- 3.36 Although the habitats within the various Meres Ramsar sites and Mottey Meadows SAC are potentially vulnerable to air pollution, none of the component SSSIs within 10km of the borough (the average travel distance beyond which traffic tends to disperse across the network) are within 200m of a major road or journey to work route likely to be associated with the borough.
- Overall, LSEs of the Local Plan regarding atmospheric pollution can be excluded and this impact pathway 3.37 is screened out from Appropriate Assessment.

- ²⁶ Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 2003. UK
- National Atmospheric Emissions Inventory. http://www.airguality.co.uk/archive/index.php [Accessed on the 21/10/2021] ²⁷ The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to

- ²⁹ Available at: http://www.dft.gov.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf [Accessed on the 21/10/2021]
- ³⁰ <u>https://www.nomisweb.co.uk/census/2011/WU03UK/chart/1132462387</u> [Accessed 07/07/2020]

²⁴ <u>http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm</u>.

²⁵ Pain, B.F.; Weerden, T.J.; Chambers, B.J.; Phillips, V.R.; Jarvis, S.C. (1998). A new inventory for ammonia emissions from U.K. agriculture. Atmospheric Environment 32: 309-313.

occur. ²⁸ Available at: <u>http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013</u> [Accessed on the 21/10/2021]

4. Appropriate Assessment

Water Demand and Impact of Water Quality

- 4.1 The following policies were screened in for Appropriate Assessment with regard to water resource impacts, because LSEs could not be excluded:
 - Policy S4 Housing delivery strategy
 - Policy EC6 Telford Town Centre
 - Policy HO1 Housing Allocations
 - Policy HO2 Sustainable Communities
 - Policy HO8 Gypsy, Traveller and Showpeoples Accommodation
- 4.2 Severn Trent Water Resource Management Plan Summary states that: "a significant deficit will develop between supply and demand for water over the medium term unless we act... the need to prevent the risk of future environmental deterioration, is a fundamental requirement of the Water Framework Directive. This means that in order to protect our environment for future customers, some of our current sources of water cannot be relied upon in the future and we need to find alternative ways of meeting demand"
- 4.3 A third of drinking water supplied by Severn Trent comes from ground water, from a range of sandstone aquifers in the Midlands, Derbyshire and the Cotswolds. The remaining two thirds of water supply comes from rivers and reservoirs in lowland and upland areas like the Peak District. Telford's main water supply comes from groundwater treated at works within Shropshire.
- 4.4 In order to ensure that water supplies can be maintained and the environment protected, 22 solutions are contained within the WRMP 2019 to address the forecast shortfall in the supply-demand balance over the planning period. These include water transfers, expansions and enhancements of WwTWs, new WwTWs, and increasing reservoir capacity.
- 4.5 The HRA of the WRMP 2024 determined that the demand solutions involve relatively small-scale and temporary activity and are largely concentrated within urban and suburban areas and unlikely to be within close proximity to Habitats sites. The HRA ruled out all but one supply solution as having No Likely Significant Effect on Habitats sites. One transfer solution was taken to Appropriate Assessment. However, it was concluded that the implementation of the solution would not have any adverse effect on the integrity of any Habitats sites in the supply area.
- 4.6 Moreover, the Local Plan identifies that all new development will need to be highly water efficient. This can be achieved by designing in water efficiency measures such as low flush toilets, rainwater harvesting and greywater recycling in new development. This will be achieved by Policy CC4: Water re-use, conservation, efficiency and quality.
- 4.7 It is considered that the commitment in Policy CC4: Water re-use, conservation, efficiency and quality, would make it more feasible for Severn Trent to reduce reliance on groundwater abstraction during periods of high demand and/or low flow, this would protect the SAC and Ramsar sites. It is therefore considered that the Telford & Wrekin Local Plan would have no adverse effect on the integrity of Habitats sites through this impact pathway.
- 4.8 With regard to surface water runoff impacts on Midlands Meres & Mosses Phase 2 Ramsar site, Policy CC5 (Flood risk management and sustainable drainage systems) requires all developments that require Sustainable Drainage Systems to:
 - Be designed in accordance with the council's SuDS Handbook and relevant national standards;
 - Ensure that surface water discharge rates do not exceed the site specific Greenfield runoff rates and that increases in peak rainfall due to climate change are taken into account;
 - Incorporate SuDS into the green space strategy for the site, ensuring they are designed to be multifunctional where possible and visually appealing such as mimicking biodiverse natural features where possible; and

- Include details of future maintenance over the lifetime of the proposal.
- 4.9 Moreover, the Environment Agency will object to any development which results in a net increase in surface water runoff above existing greenfield rates. Therefore, in practice it is not expected there would be any adverse effect on the integrity of any Habitats sites through this impact pathway.

5. In Combination Effects

- 5.1 It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and project that may also be affecting the Habitats site(s) in question.
- 5.2 With regards to atmospheric pollution, beyond 200m the contribution of vehicle emissions from the roads to local pollution levels is insignificant. None of the component SSSIs within 10km of the borough (the average travel distance beyond which traffic tends to disperse across the network) are within 200m of a major road or journey to work route likely to be associated with the borough. This means that increases in atmospheric pollution <u>can be excluded, both individually and in combination.</u>
- 5.3 With regards to water demand and impact of water quality, no sites would have an impact of run off. The Severn Trent Water Resource Management Plan covers the water resources for their area and thus considers in in combination impacts of growth. To maintain water supplies and protect the environment protected, 22 solutions are contained within the WRMP 2019 to address the forecast shortfall in the supply-demand balance over the planning period. The HRA of the WRMP found that most of these solutions had No Likely Significant Effect on Habitats sites, with the only one taken to appropriate assessment being concluded to not have any adverse effect on the integrity of any Habitats sites in the supply area. This means that water demand and water quality <u>can be excluded, both individually and in combination.</u>
- 5.4 With regards to recreational pressure, the majority of the Habitats sites that the Telford and Wrekin Local Plan may impact are closed to the public and thus any increase in population would not have any impact, either alone or in combination with other plans and projects. Aqualate Mere is open as a nature reserve; however, access is restricted to a few public rights of way and a bird hide. Dogs are required to be kept on leads throughout the site, therefore recreation is appropriately managed to handle any potential increase in use. This means that recreational pressure <u>can be excluded</u>, both individually and in combination.

6. Conclusions & Recommendations

- 6.1 This HRA assessed the potential for the Telford and Wrekin Local Plan to result in Likely Significant Effects (LSEs) and, where relevant, adverse effects on Habitats sites, specifically Severn Estuary SAC/SPA/Ramsar site, West Midland Mosses SAC, Cannock Chase SAC, Midlands Meres and Mosses Phase 1 Ramsar site, Midlands Meres and Mosses Phase 2 Ramsar site; and Mottey Meadows SAC.
- 6.2 LSEs screening identified that all of the assessed sites could be screened out from Appropriate Assessment regarding atmospheric pollution and recreational pressure. However, due to the vulnerability of Midlands Meres and Mosses Phase 2 Ramsar site to Water pollution and the proximity to site allocations, this site was taken forward to Appropriate Assessment in relation to Water Demand and Impact on Water Quality.
- 6.3 Five policies were identified within the local plan which may have significant effect on the water quality and availability within the Habitats sites. These policies are:
 - Policy S4 Housing delivery strategy
 - Policy EC5 Telford Town Centre
 - Policy HO1 Housing Allocations
 - Policy HO2 Sustainable Communities
 - Policy HO8 Gypsy, Traveller and Showpeoples Accommodation
- 6.4 Severn Trent Water Resource Management Plan Summary states that action is needed to meet a forecast deficit in the medium term: "a significant deficit will develop between supply and demand for water over the medium term unless we act... the need to prevent the risk of future environmental deterioration, is a fundamental requirement of the Water Framework Directive. This means that in order to protect our environment for future customers, some of our current sources of water cannot be relied upon in the future and we need to find alternative ways of meeting demand"

- 6.5 In order to ensure that water supplies can be maintained and the environment protected, 22 solutions are contained within the WRMP 2019 to address the forecast shortfall in the supply-demand balance over the planning period. The HRA of the WRMP 2019 determined that all bar one supply solution as have No Likely Significant Effect on Habitats sites. One transfer solution was taken to Appropriate Assessment however, it was concluded that the implementation of the solution would not have any adverse effect on the integrity of any Habitats sites in the supply area.
- 6.6 It is considered that the commitment in Policy CC4: Water re-use, conservation, efficiency and quality, would make it more feasible for Severn Trent to reduce reliance on groundwater abstraction during periods of high demand and/or low flow, this would protect the SAC and Ramsar sites.
- 6.7 With regard to surface water runoff impacts on Midlands Meres & Mosses Phase 2 Ramsar site, Policy CC5 (Flood risk management and sustainable drainage systems) details the need for SUDS and requires all developments that require SUDS to have them appropriately designed and managed. Moreover, the Environment Agency will object to any development which results in a net increase in surface water runoff above existing greenfield rates. Therefore, in practice it is not expected there would be any adverse effect on the integrity of any Habitats sites either alone or in combination with other plans or projects.

Appendix A LSEs Screening

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Policy Strategic S1 'Protecting and Enhancing	 This policy outlines how development should support Green Spaces in the borough by: Protecting existing green spaces set out in the Local Plan; 	There are no Likely Significant Effects of this policy on Habitats Sites.
the Boroughs Green Spaces'	Delivering new green space and enhancing and diversifying existing green spaces;	This is a positive policy, which protects green spaces and biodiversity and nature. This is a positive policy that does not
	Protecting and enhancing woodland and trees;	allocate any quanta of development.
	Prioritising nature recovery;	There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from
	Helping to address the climate change and biodiversity crisis.	Appropriate Assessment.
	Policy supports individuals and communities who are taking sustainable action against climate change.	
Policy Strategic S2 'Nature conservation'	This policy states the expectation of developments to protect, maintain and enhance biodiversity and geodiversity.	There are no Likely Significant Effects of this policy on Habitats Sites.
	Impacts must be identified and should be mitigated following the mitigation heirarchy of avoid, mitigate and finally compensate.	This is a positive policy, which encourages developers to protect biodiversity and geodiversity. This policy does not set
	A hierarchy of location should be used to protect local biodiversity with onsite	any quanta or allocations for growth.
	enhancement/compensation being preferred, then within the borough, an adjacent LPA and finally further afield.	There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy Strategic S3 'Economic delivery strategy'	This policy plans for the delivery of a minimum of 167ha of employment land.	Likely Significant Effects on Habitats Sites cannot be
	This development will be delivered through:	excluded.
	The completion of sites with planning permission;	This is a development management policy that supports the development of 167ha of Employment land.
	The allocation of new employment sites;	The provision of further employment land is associated with the
	Directing development to the Strategic Employment Areas;	following impact pathways: Water quality
	Development of suitable sites in the urban and rural areas;	Water quantity, level and flow

	The delivery of sites, where identified in Neighbourhood Plans.	Due to these linking impact pathways, Policy S3 is screened in for Appropriate Assessment.
Policy Strategic S4 'Housing delivery strategy'	 This policy details the housing requirement of 20,200 homes. 55% of this housing requirement is already consented, under construction or already built. The Council is planning to deliver an average of 1,010 dwellings a year through existing supply and land allocations. If monitoring indicates that delivery is likely to fall below what is required then the Council will seek to increase the delivery of sites. Housing development will be supported and delivered through: The completion of sites with planning permission; The allocation of new housing sites as shown on the Policies Map; Well-designed windfall development in the built up areas on a 'brownfield first' approach; Where supported in the rural area by other policies in this plan; Well-designed self-build homes 	 Likely Significant Effects on Habitats Sites cannot be excluded. This is a development management policy that supports the development of 1,010 dwellings per year. The provision of additional dwellings within the local plan area are will increase the number of residents within the plan area. This is associated with the following impact pathways: Recreational Pressure Water quality Water quantity, level and flow Due to these linking impact pathways, Policy EC5 is screened in for Appropriate Assessment.
Policy Strategic S5 'Mitigating and adapting to climate change'	 Policy outlines that development should positively contribute to meeting targets to address climate change. This policy supports development proposals that help mitigate climate change, considering how the proposals are designed to: reduce the need to travel and encourage sustainable modes of travel; reduce energy consumption; Maximise opportunities for natural heating and ventilation; Support the move towards low/no carbon technology and renewable energy; Incorporate multi-functional green space. In determining whether development supports adaptation to climate change and does not make other areas more susceptible to the impacts of climate change, the Council will consider how proposals: Reduce demand on water resources; 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a positive policy, which encourages developers to integrate measures which mitigate and reduce the impact of climate change on the development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment

	Consider the risk and impact of flood risk;	
	Incorporate well-designed multi-functional sustainable drainage systems;	
	Incorporate design features to ensure development, including open spaces and the public realm, is resilient to climate change;	
	Balances the need to protect and conserve historic assets.	
	Sustainability Statements will be required for new development, demonstrating how they will contribute to mitigating and adapting to climate change and climate objectives including achieving Net Zero.	
Policy Strategic S6 'Healthy stronger communities'	 This policy states that development will be expected to: Demonstrate healthy design principles that provide opportunities to be physically active, active travel, improved air quality and improved mental wellbeing; 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a design management policy, which requires
	• Prioritise the safety and security of residents and users enabling safe movement of walkers, wheelers and cyclists, encourages community activity and designs out the potential for anti-social behaviour;	developments to be safe and well designed for the community. It does not set any quanta or allocations for development. There are no impact pathways that link this policy to
	Help create a cohesive and sustainable community;	Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
	• Support residents to live well in their own communities for longer;	
	• Contribute to the wellbeing of residents through, for example, guarding against an excess of uses such as takeaways and betting shops in town and district centres and encouraging access to a healthy environment providing access to food outlets selling healthy food options and the opportunity to grow their own food;	
	• Provide thermally efficient accommodation thus helping reduce fuel poverty and damp.	
Policy Strategic S7 'Developer contributions and infrastructure delivery'	Policy states that contributions towards infrastructure will be used to mitigate the adverse impacts arising from a development (or the cumulative impact) and provide community benefit.	There are no Likely Significant Effects of this policy on Habitats Sites.
	Major development proposals must contribute to the cost of infrastructure, including on- going costs in addition to other costs permitted by law. The council will secure the delivery of infrastructure through the following means;	This is a policy, which requires developers to provide a fiscal contribution to the infrasture requirements of new developments. It does not allocate or set quanta for any new development.
	Onsite, delivered either by the developer or, with an appropriate contribution by the Council;	

	 Offsite either by the developer in agreement with the Council where it is necessary to make the development happen; Offsite funded, in whole or in part, by financial contributions from developers. 	There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy NE1 'Biodiversity and geodiversity'	 This policy protects designated areas. Nationally and internationally protected sites will be afforded the highest level of protection. Development impacting locally designated sites should: Prepare a Preliminary Ecological Appraisal (PEA) assessing the impacts on designated sites; If impacts are likely, these must be outweighed by the overall benefit of the proposal Ensure appropriate mitigation, and its long term management, is secured. Financial developer contributions will be required, where appropriate, to address impacts on designated sites. This policy supports sustainable development which secures biodiversity net gains. Development should where applicable: Provide an Preliminary Ecological Assessment to consider the impacts of the development Maintain, protect and enhance habitats with attention to priority, veteran and irreplaceable habitats and ecological networks; Maintain, protect and, where appropriate, enhance populations of species of principal importance; Provide appropriate buffer zones between development proposals and biodiversity and geodiversity assets; Be designed to be ecologically permeable, protecting and enhancing existing green infrastructure and providing new, integrated connections to wider biodiversity features; Identify, protect, and appropriately manage geodiversity assets. 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a positive policy, which encourages developers to take measures which protect and enhance biodiversity within the plan area. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment

Policy NE2 'Trees,	Development harming irreplaceable or priority habitats, protected species or designated sites will not be supported unless appropriately mitigated or compensated, Appropriate habitat creation, restoration, mitigation or enhancement on site or elsewhere will be secured by planning condition, obligations or a legal agreement.	There are no Likely Significant Effects of this policy on
Policy NE2 'Trees, hedgerows and woodlands'	 This policy supports development which retains, protects and appropriately manages existing trees, hedgerows and woodland Development should: Assess the impact of proposals on trees, hedgerows and woodlands; Incorporate trees as an integral part of scheme design, Use climate and disease resistant tree species with a 50:50 native/non-native tree mix, as appropriate; Protect retained trees, hedgerows and woodlands before, during and after any construction work; Ensure appropriate long term management, maintenance and protection of trees, hedgerows or woodlands; Provide replacement and enhancement of planting, maintaining amenity value, character and biodiversity of the local area either through biodiversity net gain or, where this does not apply, through the consultation with the Council. Development removing ancient or veteran trees, hedgerows and/or woodlands, will only be supported with appropriate justification. The council will secure the delivery of offsite planting via condition and/or planning obligation and will direct offsite planting in line with local priorities. Development occurring immediately adjacent to irreplaceable habitats will be required to adequately buffer these features from the impacts of development. 	Habitats Sites. This is a positive policy, which encourages developers to take measures which protect trees and hedgerows within the plan area as well as setting appropriate requirements for any areas of new trees that are planted. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.
Policy NE3 'Biodiversity Net gain'	 Policy states that all new development should deliver biodiversity net gains. Major developments should deliver in excess of 10% biodiversity net gain. Biodiversity net gain should be delivered onsite where possible. Off-site solutions will be supported where the mitigation hierarchy of 'avoid, mitigate, compensate' and onsite over offsite solutions have been rigorously applied. Non-major developments not legally required to provide a minimum 10% net gain that demonstrate measurable net gains in biodiversity, proportionate to the development will be supported. 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a positive policy, which requires developers to contribute to biodiversity net gain. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment

	Provision should be locally appropriate and deliver more, bigger, better and joined up habitats. All relevant development proposals must be supported by an appropriate biodiversity net gain plan. Any offsite financial contributions needed to achieve biodiversity net gain must be secured by recognised legal mechanisms. They should be delivered in line with local, regional and national priorities for biodiversity. The council expects offsite provision to be delivered within the borough. If this is not possible the reasons for this should be set out and closest alternative provision used.	
Policy NE4 'Greening factor'	 Major development proposals must contribute towards the greening of the borough through multifunctional green and blue infrastructure within the site design. Major residential development proposals, or proposals that are predominately residentially led, should meet a minimum Greening Factor of 0.4. Major non-residential development, should aim to meet a Greening Factor of 0.3. Where the Greening Factor cannot be met on site, then the council will work with applicants to identify offsite opportunities to enhance local green infrastructure. This would be secured by planning conditions and/or obligations and delivered in line with locally identified needs. 	There are no Likely Significant Effects of this policy on Habitats Sites.
Policy NE5 'Green network'	 This policy seeks to protect, maintain, enhance and, where possible, extend the green network. New development within the green network will only be supported where it identifies, protects and enhances the green network Proposals are expected to assess and justify the development against these functions, including: providing significant visual amenity value providing separation between built up areas with open areas, water bodies or woodland providing an appropriate supply of open land to meet recreational needs maintaining, protecting and enhancing the borough's ecological value by providing ecological networks, corridors and stepping stones; 	 There are no Likely Significant Effects of this policy on Habitats Sites. This is a positive policy, which requires developers to take measures to protect and enhance the green network. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment

	 maintaining, protecting and enhancing the unique geological and archaeological features within the borough as a legacy of its early place in the Industrial Revolution; provide open space linkages through which footpath, cycleways and ecological corridors can connect Development must demonstrate that the benefits outweigh adverse impacts on the Green Network. 	
Policy NE6 'Shropshire Hills and strategic landscapes'	This policy provides the highest level of protection to The Shropshire Hills Area of Outstanding Natural Beauty (AONB). Development must give great weight to conserving the landscape and scenic beauty of the AONB. Planning proposals for development in the Shropshire Hills AONB and proposals likely to have a significant adverse effect on the special qualities of the AONB will be resisted. This policy states that the council will protect the borough's Strategic Landscapes from development which would cause detrimental change to the quality of the landscape including the appearance and intrinsic landscape quality.	There are no Likely Significant Effects of this policy on Habitats Sites.This is a design management policy, which encourages developers to take measures which protect and enhance biodiversity within the plan area.There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy NE7 'Strategic green gaps'	 The council will only support development within a strategic green gap where it: Is not detrimental to the function or aim of the green gap; Preserves the identity of the settlements of Lilleshall and Wrockwardine; Maintains a physical and perceptual separation of the built areas of the settlements; Is essential for the development to be located in the green gap, and the benefits of the proposal outweigh the impacts. Development within a strategic green gap should have regard to: The siting, layout, scale, design, materials and landscaping to protect the function of the strategic green gap and retain the undeveloped character; Access to the countryside via footpaths, cycleways and bridleways. 	 There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which restricts development within the green gap to ensure that it fills its ecological function and separates the settlements. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy EC1 'Employment development in the urban area and SEAs'	Policy designates the SEAs as the primary focus for employment development. The development strategy for the SEAs includes:	There are no Likely Significant Effects of this policy on Habitats Sites.

 Development proposals for industrial, storage and distribution uses will be supported;

- Economic activities including business uses will be supported in SEAs where:
 - They are ancillary to the industrial, storage and distribution uses and support the SEA
 - They do not undermine the viability of existing employment uses.
- Other uses outside of these criteria will generally not be supported in the SEAs.

Employment development in the urban area (excluding allocated sites and SEAs) should:

- Be located:
 - In close proximity to a SEA;
 - On an existing established employment site;
 - Elsewhere in the urban area, where there are no suitable opportunities within or adjacent to strategic employment areas.
- Maintains and enhance sustainable access;
- Have appropriate parking provision including for electric vehicles;
- Not have a significantly adverse impact on adjacent uses;
- Provide high quality, diverse landscaping and boundary treatment;
- Demonstrate that no appropriate previously development land is available in the built up areas of Telford or Newport, if the development is planned for greenfield sites.

Outside of SEAs the loss of existing employment land will only be supported where:

- the site is no longer suitable or viable for employment uses;
- The proposed use would not conflict with neighbouring uses;
- The sustainability benefits of the proposal clearly outweigh the loss of the employment land.

This is a development management policy, which controls development in the SEAs and the development of employment land. This policy does not make any specific allocations or quanta for development.

There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.

Policy EC2 'Employment development in the urban area'	 This policy states that outside of SEA the loss of existing employment land will only be supported where: a. Evidence is submitted that satisfactorily demonstrates that the site is no longer suitable, or viable, for employment uses including the current/last use of the site and alternative employment uses; b. The proposed use would not conflict with neighbouring uses c. The sustainability benefits of the proposal clearly outweigh the loss of the employment land. 	There are no Likely Significant Effects of this policy on Habitats Sites.This is a development management policy, which controls change of use of land in urban areas. This policy does not make any specific allocations or quanta for development.There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy EC3 'Employment in the Rural Area'	 Employment development in the rural area should be directed to: The re-use/conversion of redundant buildings; The redevelopment of previously developed land; Sites which would form and enable the expansion/extension of an existing business/employment use The council will support new employment development in the rural area where: It is successfully demonstrated that the proposal would benefit from a rural location or it would assist the diversification of the rural economy; The proposal is supported by an appropriate business case which demonstrates the economic benefits to the local economy; There is no significant adverse impact on local highway capacity and safety, unless appropriate mitigation measures can be implemented; It would not have a detrimental impact on the character and quality of the rural area and nearby uses. Development which would assist in the retention and/or development of accessible local services and community facilities would be supported. 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which controls development in the rural area and encourages developers to focus development on existing buildings and previously developed land. This policy does not set any quanta or location for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy EC4 'Waste management facilities'	 This policy details the criteria for development of new and existing waste management facilities. These include: Development of waste management facilities should add value to and help deliver on the principles of the circular waste economy by moving waste further up the waste hierarchy; 	There are no Likely Significant Effects of this policy on Habitats Sites.This is a positive policy, which encourages developers to take measures which protect and enhance biodiversity within the plan area.

	 Applications for a change of use for waste management sites must show that relevant waste capacity is no longer required; Proposals should demonstrate that they help increase recycling, create employment opportunities, minimise the impact on the environment and contribute to the local community; General waste management facilities and developments associated with such facilities should be located in the Strategic Employment Areas as well as Tweedale. Exceptions to this include: Where waste facilities meet specialised needs that can't be located in these areas; The need for specialised waste facilities; The use of previously developed sites that might not be suitable for other uses and facilities that can co-locate close to waste producers or users of treated materials; New landfill sites and extensions will only be allowed where there is a need and only for waste that cannot practicably be recycled, composted or recovered. Where development proposals for any other use come forward near existing waste sites, there must not be conflict with the operation of the existing waste site. 	There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy EC5 'Hierarchy of centres'	 This policy seeks to maintain and enhance of the centres. The policy details a hierarchy for town and local centre development. These will be the focus of retail, office and leisure developments and community facilities: Principal Town Centre: Telford Town Centre; Market Towns: Newport and Wellington; District centres: Dawley, Donnington, Hadley, Ironbridge, Lawley, Madeley and Oakengates; Local centres Proposals which contribute to the diversity and vitality of these centres having regard to their role in the hierarchy will be encouraged and promoted. 	 There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy which establishes a hierarchy of town centres and encourages policies that contribute to them. It does not set any quanta or allocations for growth. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.

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Policy EC6 'Telford Town Centre'	 This policy outlines support for Telford Town Centre and its retail and leisure uses by: Encouraging activities and services that complement main town centre uses; 	Likely Significant Effects on Habitats Sites cannot be excluded.
	• Encouraging high-tech, research and development, Information Technology industries, knowledge based industries and education facilities to locate in the Town Centre;	This is a development management policy that supports the development of Telford Town Centre. While no specific quanta are provided, the policy establishes locations in which proposals (e.g. leisure and tourism uses) will be delivered.
	• Focusing the location of community facilities, leisure venues and education in the Town Centre;	The provision of further cultural and tourism opportunities may increase the number of temporary visitors to Telford and are associated with the following impact pathways:
	• Creating, enhancing and improving the public realm and connectivity through high quality, legible and safe routes, streets and spaces.	 Water quality Water quantity, level and flow
	 Development in the Town Centre area will be supported if: The development supports a healthy environment and doesn't have significant adverse impacts on health and wellbeing; 	Due to these linking impact pathways, Policy EC5 is screened in for Appropriate Assessment.
	 Encourages active travel and use of sustainable modes of travel; 	
	Does not have significant adverse impacts on access, movement and parking availability;	
	It enhances gateways into the Town Centre and improves interconnectivity as a whole;	
	• Supports and enhances the vitality and viability of the Town Centre.	
	The retail and leisure function will be maintained and enhanced by:	
	• Supporting retail and complementary leisure uses in the Primary Shopping Area	
	• Supporting appropriate uses in the PSA Secondary Frontage that complement the primary retail function, providing active frontage and contribute to the Town Centre;	
	• Supporting change from retail and leisure uses where it complements retail and leisure functions and maintains an active frontage.	
	Residential development in Telford Town Centre will be supported where:	
	• The proposal is a major, comprehensive development appropriate to the location;	
	The mix and type of units are appropriate;	

	It encourages active travel and access to public transport;	
	 Active frontage for an appropriate use is included at in the primary shopping area or on strategic pedestrian routes; 	
	Appropriate parking provision is provided, including for electric vehicles and cycle storage.	
	Major new conference and exhibition business and ancillary uses will be directed to the Conference and Exhibition Area. Development should support active travel connections to the wider Town Centre area.	
	Telford Town Park's recreation and leisure uses, qualities and character are to be protected. The impact of development on the setting of the Town Park will be considered.	
Policy EC7 'Market Towns and district centres'	Policy outlines criteria for a shift of use within the primary shopping areas. These ensure a change in use must:	There are no Likely Significant Effects of this policy on Habitats Sites.
	• Complement the function of the centre and protect the retail character of the Market Town or District Centre;	This is a policy, which limits the change of use of properties within the Primary Shopping Areas. It does not allocate any
	 Not excess non-desirable uses including takeaways, betting shops, vape shops and off licences; 	quanta or sites for growth. There are no impact pathways that link this policy to
	• Not result in 3 or more adjacent units that have no active daytime frontage;	Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
	• Have no significant impact on the amenity, health and wellbeing of the community;	
	Proposals for the Primary Shopping are that positively contribute and make use of outdoor space are encouraged	
	Proposals for residential development in the primary shopping area should:	
	Have non-residential uses maintaining an active frontage at street level;	
	• The development is appropriate for the centre setting and doesn't conflict with business uses;	
	Appropriate parking is provided.	
	In the Market town and district centres a shift to commercial uses (including Hotels, Leisure community and education facilities)is supported.	
Policy EC8 'Local centres and rural services'	This policy supports multi-use buildings, community facilities and services improving local communities.	There are no Likely Significant Effects of this policy on Habitats Sites.

	 Development resulting in the loss of floor space for Use Classes E and F will not be supported in Local Centres or the rural area unless: equivalent nearby services or uses meet residents' needs There is no interest for the current use or any other use within Use Class E or F; The proposal will provide a community facility for which there is a demonstrable need. 	This is a policy, which limits the loss of certain uses in Local centres and the rural area. It does not allocate any quanta or sites for growth. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy EC9 'Out of centre and edge of centre development'	 Policy states that main town centre uses will only be supported in Telford Town Centre, a Market Town, District or Local Centre unless there are no suitable sites. Proposals for retail and leisure uses outside these areas require a Retail Impact Assessment if the proposal provides floorspace of: greater than 500 square metres gross for within 500 metres of Telford Town Centre; greater than 300 square metres gross for within 500 metres of a District Centre; greater than 200 square metres gross for within 500 metres of a Local Centre. Retail Impact Assessments should demonstrate that it will not significantly impact the vitality and viability of a Centre. If planning permission is granted for new retail development in an out of centre or edge of centre location, the range of goods sold may be restricted. Proposals outside or on the edge of a defined centre must demonstrate a high standard of design in keeping with the local area, no significant impacts on highways or parking, or appropriate mitigation, no significant impact on local amenity. 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which limits the development of town centre uses outside of the designated town and local centres. It does not allocate any quanta or sites for growth. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy EC10 'Evening and night time economy'	 This policy supports evening and night time uses if they are located in an identified centre if they meet certain criteria including: Their likely impact on the character and function of the centre; Their impact on the living conditions of nearby residents; Whether they would result in adverse public health impacts, anti-social behaviour, extra litter, noise and crime, including security issues raised by crowded places; Whether the centre can accommodate the required transport needs; Their overall impact on the vitality and viability of existing centres during the day. 	 There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which sets criteria for the development of evening and nighttime uses. It does not allocate any quanta or sites for growth. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment

	• Protecting and supporting existing evening and night-time cultural venues;	
	Diversifying the range of night-time activities.	
Policy EC11 'Shopfront and advertisement design'	The policy details requirements for the support of new shopfronts and alterations to existing shopfronts including:	There are no Likely Significant Effects of this policy on Habitats Sites.
	High quality design and materials which complements adjoining properties and the building;	This is a design management policy, which controls the appearance of the shopfronts and advertisements. It does not
	• Historic shop fronts with traditional facades should be retained and repaired;	allocate any quanta or sites for growth.
	• The use of blinds, canopies or shutters are appropriate to the character of the shopfront;	There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
	• Signage and illumination does not prejudice highway safety or visually intrude on residential properties;	
	• Signage should be limited to the facade above the shopfront, not encroach on upper storeys, not have multiple projecting signs; and not result in increased adverts in There area.	
	Internally illuminated signage will not be supported in heritage area other than in exceptional instances appropriate to the age and design of the building	
	This policy supports forecourt trading assuming it does not cause obstruction or negatively impact the character and appearance of There area.	
Policy HO1 'Housing Allocations'	This policy proposes housing allocations as set out in Appendix C (of the Draft Reg 19 plan).	Likely Significant Effects on Habitats Sites cannot be excluded.
	Planning applications for larger housing developments, or where smaller developments must collaborate, there must be:	This is a development management policy that supports the allocates several sites for housing development.
	 An indicative layout for the entire site; A Design Code/Brief to support the development; 	The provision of housing developments will result in an increase the number of residents within the plan area. This is associated with the following impact pathways:
	 Measures addressing flood risk and surface water; 	Water quality
		Water quantity, level and flow
	A transport assessment and travel plan to promote sustainable travel.	Due to these linking impact pathways, Policy HO1 is
	Measures mitigating and adapting to climate change;	screened in for Appropriate Assessment.
	A report detailing the land conditions and site levels information;	

Policy HO2 'Sustainable Communities'	 Key principles and structure for meeting biodiversity net gain, greening requirements and open space strategy; A comprehensive strategy for the phasing of the site and key infrastructure; Demonstration of how the site complies with relevant planning policy. Planning applications for the development of all or part of a sustainable community site should include a masterplan, Design Code and Sustainable Principles. The SUE should deliver certain facilities and infrastructure as a minimum, including: 1,000 or more homes Accessible homes, Supported and specialist housing provision and provision of at least 5% self-build or custom-build plots Provision of a centrally located district / local centre Meaningful provision of employment land Provision of a Primary School and contribution to a local secondary school Support for sustainable modes of travel including improvement of cycle and pedestrian connectivity to and from the site In excess of 10% onsite Biodiversity Net Gain Urban Greening measures; Multi-functional open space On site renewable energy generation Well-designed Sustainable Urban Drainage Systems and heat island reducing measures Air Quality Management and Monitoring. 	 Likely Significant Effects on Habitats Sites cannot be excluded. This is a development management policy that supports the development of Sustainable Communities Sites. These will include the development of housing, employment land and local services. The provision of housing developments will result in an increase the number of residents within the plan area. This is associated with the following impact pathways: Water quality Water quantity, level and flow The provision of employment land a local servies are associated with the following impact pathways: Water quality Water quality Water quality, level and flow Due to these linking impact pathways, Policy HO3 is screened in for Appropriate Assessment.
Policy HO3 'Housing mix and quality'	Policy states that development must provide a variety of types, tenures and sizes of housing that reflects local need.	There are no Likely Significant Effects of this policy on Habitats Sites.

	All development must meet the internal space standards from the Nationally Described Space Standards. Development must provide private outdoor amenity space. Communal provision of outdoor amenity space instead will only be accepted in flatted developments or in exceptional circumstances. Where it can be demonstrated that availability of land is sparse, alternative outdoor spaces such as useable balconies and roof gardens would be acceptable in lieu of ground floor outdoor amenity space. Development must be capable of adaptation and extension to accommodate the changing lifestyles and needs of households over time.	This is a development management policy, ensuring a range of tenures of property and suitable design for all housing policy. This does not have an impact with regards to the HRA. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy HO4 'Affordable housing requirements'	 Policy states that major residential developments should maximise affordable housing delivery and must deliver a minimum of: 25% affordable homes in the Telford built-up area; 35% affordable homes in Newport and the rural area The council will secure 25% of all affordable housing as First Homes. Developments providing affordable housing above these targets (up to 100%) will be supported where it meets local housing needs, creates mixed and balanced communities and conforms to other relevant policies within the Local Plan. 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which ensures the provision of affordable housing. Affordable housing does not have a differing impact than regular housing from an HRA perspective, thus there are no additional impacts from this policy. This policy does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy HO5 'Affordable housing delivery'	Policy states that affordable housing is to be delivered on-site through a mix of affordable housing sizes and tenures based on local needs. Affordable housing should be integrated across the development, including during each phase of larger sites. Affordable housing should be tenure neutral in its design, materials, compliance with internal space standards and private amenity space, and parking provision Off-site affordable housing will only be considered where it is not feasible to deliver on- site or there are overriding benefits to providing it off-site On-site affordable housing should be transferred to a Registered Provider prior to the completion of all open market housing on-site; Affordable housing should remain affordable in perpetuity; Off-site contributions should enable affordable housing to be provided elsewhere in the borough.	 There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which ensures the provision of affordable housing. Affordable housing does not have a differing impact than regular housing from an HRA perspective, thus there are no additional impacts from this policy. This policy does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment

	 Proposals for reduced affordable housing contributions will only be considered in exceptional circumstances. Where vacant buildings are being reused or redeveloped and the buildings have not been abandoned, in accordance with the government's vacant building credit; Where a viability appraisal has been submitted and agreed by the council, with an appropriate review mechanism for any reduced or waived affordable housing contribution to seek policy compliance over the lifetime of the project 	
Policy HO6 'Supported and specialist housing'	 This policy sets out criteria for the support of development for supported and specialist housing. These include meeting an identified local need providing a mix of tenure and types of accommodation including affordable housing High quality design Appropriate amenity space and associated landscaping for the end user; well related to the local context designed to resist the impacts of climate change, flooding and air pollution on vulnerable residents Where relevant there is a clear plan of where and when domiciliary services and graduated levels of care will be provided; Meeting the needs of intended residents with onsite services and facilities, or being accessible to local services, community and support facilities. Development should consider; the mix of specialist and supported housing needs the scale, tenure, layout and type of accommodation 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which ensures the provision of supported and specialist housing. This housing does not have a differing impact than regular housing from an HRA perspective, thus there are no additional impacts from this policy. This policy does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy HO7 'Houses in multiple occupation (HMO)'	 Policy supports planning permission for houses of multiple occupancy where: There is no significant impact on residents, including neighbours; 	There are no Likely Significant Effects of this policy on Habitats Sites.

Policy HO8 'Gypsy, traveller and showpeoples accommodation'	 The HMO offer's a good standard of living accommodation; Safe, well designed vehicle access and parking is provided; Waste/recycling storage needs are met Adequate cycle storage is provided A need for 26 pitches over the plan period was identified in Gypsy and Traveller Accommodation Assessment Proposals for new sites should: help meet an identified need not be located in an area of high flood risk; accommodate any necessary activities to the residents' mobile lifestyle without unacceptable adverse impact have with serviced plots with all essential utilities address the impacts and causes of climate change have appropriate vehicle access have high design quality incorporating boundary landscaping and other features to safeguard amenity; Permanent facilities and amenities are designed to be thermal efficiency and good quality. 	 This is a policy, which supports the provision of Houses of Multiple Occupancy. It does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment Likely Significant Effects on Habitats Sites cannot be excluded. This is a development management policy that supports the delivery of 26 pitches for Gypsy and Traveller Accommodation. The provision of these pitches may result in an increase the number of people residing within the plan area. This is associated with the following impact pathways: Water quantity, level and flow Due to these linking impact pathways, Policy HO8 is screened in for Appropriate Assessment.
Policy HO9 'Estate regeneration'	 This policy supports large-scale refurbishment/redevelopment for existing communities, provided they meet certain criteria including: They provide a masterplan and Design Code/Brief document demonstrating regenerative benefits, that accommodation will be of a high quality and that the proposal contributes positively to the local area. Community engagement has been undertaken Any loss of housing is justified 	There are no Likely Significant Effects of this policy on Habitats Sites.This is a policy, which supports the redevelopment and refurbishment of existing housing estates. It does not set any quanta or allocations for development.There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.

	There would be no net loss of community facilities	
	Proposal address the impact of climate change	
	• Proposals deliver a mix of homes in compliance with HO3 to deliver multi- generational communities and homes for rent and sale	
	Development contributions only apply to net new dwellings to encourage the regeneration of existing housing stock and re-use of brownfield land.	
	The council may use Compulsory Purchase Order powers to assemble ownership within an estate to enable a cohesive approach to estate regeneration.	
Policy HO10 'Stalled development sites'	This policy states that the council will work with owners and developers resolve issues that have delayed brownfield sites coming forward for planning or being completed.	There are no Likely Significant Effects of this policy on Habitats Sites.
	This policy gives a framework that the council will work through with developers. This includes:	This is a policy, which makes the council work with developers and owners to resolve issues causing stalled development. It
	Initial discussions;	does not set any quanta or allocations for development.
	A Development Brief for the site;	There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from
	Pre-application advice;	Appropriate Assessment.
	• Where there's a viability case due to abnormal site costs the provision of advice and guidance in relation to available gap funding opportunities;	
	• A Stalled Sites Action Plan that will set a timetable for for planning or how the progress will be made to implement the permission;	
	Where the listed actions are exhausted the council may use a Compulsory Purchase Order to bring the sites forward for development if progress is not forthcoming.	
Policy HO11 'Self-Build and custom	This policy supports self-build or custom houses within the built-up areas of Telford and Newport or meet the requirements of policies regarding development in rural areas	There are no Likely Significant Effects of this policy on Habitats Sites.
housebuilding'	Sites delivering 100+ new dwelling should provide 5% or more as self-build or custom house plots. Within a wider development, self-build or custom housebuilding plots should have road access and utility connections. Where developed as an exception to normal rural housing policy, the council will require an appropriate agreement to ensure the plots are only provided for self-build or custom-	This is a policy, which supports self-build and custom housing. It does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from
	housebuilding in perpetuity.	Appropriate Assessment.

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Policy HO12 'Housing development in the rural area'	 The council will support housing development in the rural area by: Directing most new rural housing to sites with unimplemented planning permission; Allocating housing sites in some rural villages to support local services; Supporting a limited amount of housing development in the certain key settlements; Infill development of self-build or custom-build houses within existing settlements. 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which details how development in the rural area will be supported. It does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habutats sites. Therefore, the policy is screened out from Appropriate Assessment.
	 New isolated rural dwellings will only be supported if they meet required criteria Replacement dwellings outside key settlements in this policy will be permitted if: There is not a significant detrimental impact on amenity or There area; 	
	• The existing building to be replaced has a permanent, residential use and, if abandoned, the building has reasonable prospect of being brought back into residential use;	
	 The replacement dwelling is at most 20% larger than the existing dwelling There would be no increase in number of residential units on the site; 	
	• The replacement dwelling is on the same footprint as the existing dwelling unless there is an appropriate and justified reason for changing the location of the dwelling.	
	Proposals changing the use of existing buildings to residential will be supported if:	
	• The current use of the building is no longer needed or viable;	
	• There is a structural survey demonstrating the building to be permanent construction and capable of conversion;	
	• The proposal is largely contained within the existing building;	
	• The conversion of a heritage asset should be the optimum viable use for the building;	
	• The conversion of heritage assets should be within the existing building(s)	
	• The design protects any heritage value of the building;	
	• The site has a safe and suitable access;	

	• The residents of the proposal would not have an unacceptable amenity level.	
	Proposals for new dwellings for rural workers will be supported where:	
	• There is a need to live permanently at/near the place of work in the countryside;	
	• The application is supported by justification as to why other measures could not address the need for accommodation;	
	• The dwelling minimises the visual impact on the countryside.	
Policy HO13 'Affordable rural exception sites'	This policy supports affordable housing schemes and exempts them from normal rural housing policy if:	There are no Likely Significant Effects of this policy on Habitats Sites.
	• The site is within or immediately adjoining and well-related to the built up area of a key rural settlement	This is a policy, which exempts affordable housing from the rural development policy if it meets certain conditions. It does
	The proposal will meet a local affordable housing need;	not set any quanta or allocations for this development.
	• The dwelling meets the needs of current and future occupiers and remains affordable in perpetuity;	There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.
	• The proposal is of an appropriate scale and design for the location;	
Policy CC1 'Sustainable construction and carbon reduction'	 New development must aim to maximise energy efficiency at the outset. Development must then provide for energy needs by using on-site or local renewable energy sources. All new buildings should: Maximise solar gain whilst protecting from overheating; Enable future changes to easily be accommodated, extending the lifespan of development; Maximise the use and efficiency of passive ventilation; Use appropriate materials with high thermal mass, low embodied carbon and durability, unless this would impact certain heritage assets and areas; 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a positive policy, which encourages development to be maximally energy efficient. This policy does not set any quanta or location for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
	Maximise insulation;	
	Include facilities to recycle water;	
	Incorporate or enable the installation of low/ zero carbon technologies;	
	Use Modern Methods of Construction to reduce carbon emissions.	

	 Maximise the use of recycled material and ensure the recyclability of new materials used New homes should have a minimum Energy Performance Certificate rating of B, or equivalent standard with agreement. Major development should aim for net zero carbon emissions; Proposals for alterations to existing buildings, will be supported. They should maximise opportunities to reduce carbon emissions. Where proposals affect a building of traditional construction, energy efficiency will be expected to be improved without prejudicing the character of the building or increasing the risk of long term deterioration. 	
Policy CC2 'Renewable energy in developments'	 Policy states that major development should produce renewable energy onsite, unless existing renewable energy sources are available and can to power to the site. Major development should seek to deliver or connect renewable power and heat networks. This policy supports proposals for microgeneration unless in conflict with Local or National Policy. Major development should have a Heating and Cooling Strategy. When selecting heating systems, the following hierarchy should be followed: New development should be connected to heat networks at the point of occupation; New development should be designed with a communal heating system for potential future heat networks; Sustainable alternatives to heat networks such as individual renewable heat should be utilised. When selecting cooling systems the following hierarchy should be followed: Minimising excessive solar gain; Maximising passive cooling; Addressing residual cooling load through renewable sources. 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, that details how renewable energy and heating/cooling systems should be incorporated into development. This policy does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.
Policy CC3 'Strategic renewable energy development'	This policy supports strategic scale renewable energy production, where there is:	There are no Likely Significant Effects of this policy on Habitats Sites.

	 No significant impact on landscape, biodiversity, heritage, amenity, highway safety, or health; The community have been actively engaged to inform the development; Where consent is temporary, there is an agreed decommissioning strategy. Mitigation measures will be required as appropriate to minimise any adverse impacts. Proposals for renewable energy schemes on land protected under the Local Plan will not be supported, without exceptional circumstances. Community led renewable energy or schemes that directly benefit local communities will be supported in appropriate locations. Development proposals must ensure biodiversity and environmental improvements under the consent are protected if development stops operating and returns to previous use. Strategic renewable energy schemes should maximise opportunities for multifunctionality and community benefits. 	This is a policy, that sets criteria for the development of renewable energy resources. This policy does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.
Policy CC4 'Water re-use, conservation, efficiency and quality'	 Development should maximise the re-use and recycling of surface water Water consumption in new development must not exceed 110 litres per person per day. Development should have satisfactory disposal of surface and wastewater. Development that is detrimental to the management and protection of rivers and groundwater will not be supported without appropriate mitigation. Aqualate Mere Ramsar site is located to the north east of the borough in Staffordshire. Development will be supported where the impact on the Ramsar site is neutral or improved including the effect of nutrients on the designated site. 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a positive policy, which encourages developers to maximise the water efficiency of new development. This policy does not set any quanta or allocation for growth. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy CC5 'Flood risk management and sustainable drainage system'	 Development will be supported where: It accords with tests for flood risk; It does not prejudice land needed for flood management,; It will be safe and will not increase flood risk elsewhere; Flood control measures are incorporated and well-designed/managed if needed; Post development discharge rates do not exceed the Greenfield runoff rates; On-site surface water is managed as close to the source as possible. 	 There are no Likely Significant Effects of this policy on Habitats Sites. This is a design management policy, which requires developments to take measures that prevent the increase in flood risk. It does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment

	All developments that require Sustainable Drainage Systems must:	
	Meet the existing standards;	
	• Ensure that surface water discharge rates do not exceed Greenfield runoff rates, accounting for increases in peak rainfall due to climate change;	
	• Incorporate SuDS into the green space strategy, ensuring they are multi-functional where possible and visually appealing;	
	Include details of future maintenance.	
Policy CC6 'Managing air quality'	This policy seeks to ensure that proposals do not have a significant negative impact on air quality.	There are no Likely Significant Effects of this policy on Habitats Sites.
	Development must:Consider the impact on air quality	This is a positive policy, which requires developers ensure that there is not a significant impact on air quality from their
	• Propose appropriate mitigation to minimise emissions and air pollution to protect health and the local environment, including wildlife sites.	development and to minimize emissions. It does not allocate or set quanta for any new development.
	Where a development would have an unacceptable impact on air quality, and there is not appropriate mitigation, the development will not be supported.	There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
	Where Air Quality or Pollution Impact Assessments are not required, development should still provide appropriate mitigation to address air pollution and air quality. 4. All development shall be designed to reduce the potential for air pollution to impact on residents and occupiers such as ensuring homes are set back and away from major highway routes, where air quality is generally worse.	
Policy DD1 'Design criteria'	This policy supports development with criteria including that it:Responds positively to its context and enhances the local environment;	There are no Likely Significant Effects of this policy on Habitats Sites.
	Is appropriate for its context and its future use;	This is a design management policy, which sets criteria for
	Respects the landscape setting and topography;	development. This policy does not set any quanta or location for growth.
	Preserves historic street patterns, layouts, traditional frontages and boundary treatments;	There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from
	• Maintains important landmarks, gateways, views and respects or enhances the quality of the skyline;	Appropriate Assessment

	Use appropriate materials which reinforce or enhance local distinctiveness;	
	 Ose appropriate materials which remore of emance local districtiveness, Promotes a network of routes around and through the site linking to the surrounding area for all users; 	
	Facilitates and promotes carbon neutrality;	
	Delivers efficient water management;	
	 Investigation has been undertaken regarding land contamination and land instability issues; 	
	Provide homes with good quality internal environments;	
	No significant adverse impact on nearby;	
	Designed to meet multi-generational needs;	
	• Minimise the need for resources and be adaptable.	
	Development proposals will be expected to satisfy requirements of any adopted local design guide or design code where relevant to the proposal.	
Policy DD2 'Estate design'	 This policy supports the development of estates provided criteria are met, including: The orientation of buildings facilitates community interaction. 	There are no Likely Significant Effects of this policy on Habitats Sites.
	• There is variation in types and size of dwellings reflecting local needs;	This is a policy, which sets criteria for the development of new
	• It minimises emissions by making efficient use of land, resources, materials and energy;	estates. This policy does not set any quanta or location for growth. There are no impact pathways that link this policy to
	It provides adequate amenity space.	Habitats sites. Therefore, the policy is screened out from
	It provides on-plot parking;	Appropriate Assessment.
	Garages are in keeping with building style;	
	Pedestrian and non-motorised movement is prioritised;	
	Natural features are integrated, addressing climate change mitigation and resilience;	
	• Street layout offers a convenient choice of routes, connecting with surrounding neighbourhoods;	
	There is sufficient street lighting.	

	Design codes must be submitted, for estate developments, as part of the application process.	
Policy DD3 'Residential alterations and extensions'	 This policy supports alterations or extensions to residences that meet criteria including that they: Are appropriate in size and design in relation to the existing building and area Are accommodated within the curtilage of the existing property without impacting the amenity or that of neighbouring properties/uses; Include features which are energy, waste and water efficient; Will not result in adverse environmental impacts such as noise, odour, dust or light upon the immediate area; Respect existing natural features, respond positively to biodiversity net gain, and where possible integrate greening measures; Residential annexes must be ancillary to the main dwelling and capable of conversion for use in association with the main dwelling when no longer required by a relative or dependant. 	 There are no Likely Significant Effects of this policy on Habitats Sites. This is a development management policy, regarding the development of residential extentions and alterations. This policy does not set any quanta or location for growth. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy DD4 'Commercial and industrial design'	 This policy supports commercial and industrial development where it meets criteria including: The development uses vacant or under-utilised sites; There is a secure parking area for bicycles; Pedestrian walkways connect buildings, land use areas and adjacent development; The development includes public spaces; Site drainage minimises water collection near building foundations, entrances and service ramps; Developments minimise the visual impacts of service and equipment areas from adjoining streets, public spaces and adjacent properties. 	 There are no Likely Significant Effects of this policy on Habitats Sites. This is policy supports commercial and industrial developments that meet certain criteria. This policy does not set any quanta or location for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy DD5 'Waste planning for residential developments'	This policy supports residential development that provides sufficient, appropriate, high quality space for recycling and refuse containers; In the case of residential development;	There are no Likely Significant Effects of this policy on Habitats Sites.

	 Shared recycling and refuse facilities should be provided; If storage is not enclosed and secured it should be five metres away from the building and separate other areas to reduce risk of fire; Communal storage areas must be accessible to collection crews; Management of communal waste storage areas should be provided; Commercial waste must be separate from domestic waste storage provision. Collection points for all developments should be accessible for standard sized waste collection vehicles; Construction and excavation waste from development should be recycled on-site where possible or the destination and end use of waste taken off-site should be provided. 	This is policy makes requirements for the waste infrastructure present at new residential and mixed use developments. It also adds a reporting requirement for construction waste. This policy does not set any quanta or location for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy DD6 'Waste planning for commercial, industrial and retail developments'	 This policy supports commercial, industrial and retail developments that integrate storage and the collection of refuse and recycling, if: It provides centralised waste storage that meets the needs of the business and encourages recycling; The storage area is accessible to collection crews; Storage areas include appropriate power for lighting and compaction equipment; If storage is not enclosed and secured it should be five metres away from the building and separate other areas to reduce risk of fire. 	 There are no Likely Significant Effects of this policy on Habitats Sites. This is policy makes requirements for the waste infrastructure present at commercial and industrial developments. This policy does not set any quanta or location for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy ST1 'Active travel'	Active travel 1. The council will require, where viable, major development in the urban areas of Telford and Newport and, on a case by case basis in rural areas, to: a. Adopt site based or area wide Travel Plans for major traffic generating destinations to optimise sustainable transport modes; b. Enhance local and strategic walking, cycling routes and Public Rights of Way networks, to provide residents, employees and visitors with connectivity from the site to town, district centres, employment sites and publicly accessible green spaces; c. Design developments to meet multi-generational needs for travel and physical activity, including: Dementia friendly design On-site opportunities for physical activity (circular walking routes, for example) Step free access; and Good connections to wider walking and cycling networks. d. Enhance existing public transport services or provide new services to cater for additional users accrued by the development. Funding mechanisms should be demonstrated, to ensure the services can be secured as required by the Travel Plans.; e. Demonstrate that they have made all	 There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which restricts development within the green gap to ensure that it fills it's ecological function and separates the settlements. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment

	reasonable efforts to secure public transport services which will be conveniently routed for new residents and visitors without detrimentally effecting existing users; f. Site boarding and alighting points for public transport services in safe, well lit locations that are accessible for less able bodied users and provide safe, convenient and appropriately lit routes to and from residential and non-residential developments; g. Demonstrate, on a case by case basis, where it is not practical or viable to serve a site by conventional (bus) public transport services that a package of sustainable travel measures can be delivered offering residents travel choice and an alternative to the use of the car. 2. Where a development is served by one of the borough's rail and bus stations, development will be expected to contribute towards enhanced cycle parking and electric vehicle charging point infrastructure, bus facilities as well as improved information, enhanced waiting facilities and better access arrangements for walkers, cyclists and public transport users.	
Policy ST2 'Safeguarding rail and transport corridors'	 This policy states that development should: Safeguard land required for the implementation of priority transport projects Ensure that current and former rail lines will be protected for use as Transport Corridors Where lines are commercially viable, for freight or passenger rail services, their use for walking and cycling routes will be supported. Development adjacent to existing rail lines should not prejudice the use of the line for either heritage or commercial use. 	 There are no Likely Significant Effects of this policy on Habitats Sites. This is a development management policy, that limits development on or near rail lines and land required for transport. This policy does not set any quanta or location for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy ST3 'Impact of development on highways'	 Development must mitigate highway issues. Major developments must: Ensure that the impact of new developments on road networks are suitably mitigated Assess the cumulative impact of new developments; Provide a Transport Assessment and Travel Plans; Mitigate impacts on the road network. 	 There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which requires developers to provide suitable mitigation for the impact of development on the road network. This policy does not set any quanta or location for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
Policy ST4 'Design of roads and streets'	This policy requires development to accord with government guidance. The roads and streets must meet criteria including:	There are no Likely Significant Effects of this policy on Habitats Sites.

Policy ST5 'Electric vehicle (EV) infrastructure and design'	 Considering the needs of sustainable and active travel, freight, deliveries and refuse collection vehicles; Having lit walking, cycling and public transport routes that providing opportunities for safe sustainable travel; Enabling the adoption of road networks; Having street trees that are carefully positioned and of appropriate species and have measures for their long-term maintenance This policy states that new development must meet standards in the councils parking guidance. Development must provide electric vehicle charging. Development should consider cycle parking design elements including: on-plot space to park cycles within all residential developments; cycle parking at all employment developments; Public cycle parking in convenient locations such as shops and recreational areas; Development should consider parking design elements including: Electric vehicle charging infrastructure on or adjacent to buildings minimizing the impact on There area and allowing charging without blocking footways. Impact of parking provision on roads and public transport	This is a policy, which sets criteria for the development of roads and streets as part of a development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy sets consideration for parking provision including cycle parking and electric vehicle charging. It does not set any quanta or allocations for growth. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment
	 an appropriate allocated and communal parking provision in residential developments; Parking in accessible locations having step free access where possible; Suitably located, appropriately sized parking areas for service vehiclesfor non-residential development. 	
Policy Cl1 'Community facilities'	This policy states that development should retain existing community facilities and provide new community infrastructure to meet demand arising from development. New community facilities and improvements are supported where this meets the needs of residents.	There are no Likely Significant Effects of this policy on Habitats Sites.This is a policy supports the provision and protection pf community facilities. This policy does not set any quanta or allocations for development.

	 Where practical onsite provision is preferred however, if offsite provision would be more beneficial, contributions for the provision of facilities serving the development should be provided. The council will support the delivery of new community facilities in the following locations: In Telford Town Centre, Market Towns, District, Local Centres and villages and sustainable communities; In places with good accessibility by foot, cycle and public transport; and On open space if sufficient benefits are demonstrated; The council will not support the loss or reduction of land or buildings currently or last used as a community facility unless there is a lack of need or alternative provision exists to maintain the community's ability to meet its day-to-day needs. 	There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.
Policy Cl2 'Existing public open space'	 This policy protects existing open space. Development that harms open space, play, sports and recreational facilities must: demonstrates that the land is surplus to requirements; provide a replacement facility in a suitable location; or provide appropriate facilities to satisfy local need to replace that being lost; secure other wider benefits to play, sport and recreation facilities and public open space which outweigh the disadvantages of the loss; or Provide appropriate mitigation measures addressing another identified need within the community. 	 There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy which protects existing public space and play/sports and recreation facilities. This policy does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.
Policy Cl3 'Provision and management of public open spaces'	 This policy requires that major development provides or contributes to the provision of open space meeting the needs of the development and the local area. They must provide: On-site provision for open space, sport and play; Contributions towards the enhancement and creation of public open space or sports facilities where lacking; Public open space in accessible locations; Play and recreation spaces; Long term community use of school and private sports facilities. 	 There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy which details requires development to provide public open space and play areas. This policy does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.

	Off-site financial contributions may be acceptable if on-site provision is not feasible. Developments over a certain size shall provide play areas, with the council providing guidance on the design. Development must provide sufficient management and/or financial provision for the future management and maintenance in perpetuity of new and existing public open space. Proposals must be supported by a Landscape Management Plan.	
Policy Cl4 'Leisure, cultural and tourism'	 This policy supports development for new cultural, tourism and leisure activities and improvements to existing facilities where they: are in an accessible location within or adjacent to a centre; include high quality design and public realm; are well connected including walking and wheeling routes, electric vehicle charging, and public transport services; encourage investment and provide opportunity for the creative economy to prosper. Consideration will be given to enhancing unique venues and creating new outdoor venues and activity centres. Elsewhere in the borough cultural and tourism facilities will be supported if they cannot be accommodated in the borough's centres This policy supports major hotel accommodation within or adjacent to Telford Town Centre and the market towns of Newport and Wellington; Other types of tourist accommodation should broaden the range and quality of provision in the borough. The alignment of the Shrewsbury and Newport Canal will be safeguarded and proposals to restore the canal supported where they protect and enhance the canal alignment or Provide a suitable alternative alignment if the original alignment is in use as strategic drainage infrastructure. 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy that details requirements for the development of leisure, cultural and visitor attractions. This policy does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.
Policy Cl5 'Enhancing communication networks'	 This policy supports development that improves broadband and mobile coverage, including: working with mobile network providers to support the delivery of mobile phone and data coverage across the borough; 	There are no Likely Significant Effects of this policy on Habitats Sites.

	 Ensuring new development has infrastructure for fibre broadband services on occupation; Developers must have designed the provision of enabling infrastructure for telecoms and broadband services as part of their proposal. This policy supports proposals for telecommunications development if: Installations will are kept to a minimum; If the proposal is for a mast, the applicant must have explored the possibility of erecting apparatus on existing buildings, masts or other structures; New or extended/adapted masts should be designed to allow future sharing with other operators; The siting and appearance of the apparatus and structures should minimise impact on the surrounding area; Development should not have an unacceptable impact on several factors including highways safety and areas of ecological interest; 	This is a policy, details requirements for the development of telecommunications infrastructure. This policy does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.
Policy HE1 'Heritage assets'	 This policy protects heritage assets. Developments should conserve heritage assets in a manner appropriate to their significance. Any harm to the significance or setting of a heritage asset must be justified. Proposals conserving or enhancing the boroughs heritage assets will be supported. Proposals causing substantial harm to or total loss of a heritage asset will only be supported where there are substantial public benefits that outweigh any harm or loss to the heritage asset, or the heritage asset: cannot be sustained, prevents all reasonable use of the site; cannot be conserved by grant-funding or some form of non-profit, charitable or public ownership The harm is outweighed by the benefit of bringing the site back into use. If a heritage asset must be harmed or lost the developer must record and analyse the heritage asset. 	 There are no Likely Significant Effects of this policy on Habitats Sites. This is a development management policy, which protects heritage assets. It does not allocate any quanta or sites for growth. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment

Policy HE2 'Ironbridge Gorge World Heritage Site'	Traditional shopfronts and features should be retained and repaired as part of any development proposal. Applications made in outline form will not normally be accepted for proposals that would affect the WHS, a conservation area, a listed building or any other designated heritage asset. This policy protects the Outstanding Universal Value of the Ironbridge Gorge World Heritage Site. The greatest weight is given to the Outstanding Universal Value of the Severn Gorge area as a World Heritage Site. Protection is given to archeological sites within The Ironbridge Gorge World Heritage Site. Proposed development will be scrutinised for its effect on the archaeology of sites and monuments. The council will not support proposals which adversely affect key features of the World Heritage Site. Development within the World Heritage Site must account of flood risk and drainage, demonstrating that the site is stable and the development can address gas migration. Engineering works or development along the riverside will only be supported if the character of the river is preserved or enhanced and there are no adverse impacts on the river and deposits up or downstream. The council will support development in, and within the setting of, the World Heritage Site, that enhances or better reveals its significance.	There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which offers enhanced protection for the Ironbridge World Heritage Site and the Severn Gorge area. This policy does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.
Policy HE3 'Listed buildings'	 This policy seeks to protect listed buildings. Development that detracts from or damages the features or setting of a listed building will not be supported. Harm to a listed building is unacceptable without exceptional or wholly exceptional circumstances (depending on the grade). Support for alterations, extensions and other changes to listed buildings will only be given if certain criteria are met, including: Maintaing form, character and special interest; Preservation of internal and external architectural features; The proposed development is of an appropriate design; It is in the interest of the long term survival of the building; Extensions should be designed to be appropriate and complement the building 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which preserves listed buildings. This policy does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.

	 The development respects the setting and form of the listed building and its relationship to other features and does not impair important views of and from the building; The development is of a high quality of design, appropriate to the listed building and its context. 	
Policy HE4 'Conservation areas'	 This policy protects the character and appearance of conservation areas. Development won't be supported if: It would prejudice the essential features of the conservation area, the relationship or appearance between buildings, the arrangement of open areas and their enclosure, grain, or significant natural or heritage features; The design does not respect the character or appearance of a Conservation Area; The development doesn't do justice to the setting and surroundings of a conservation area or would impair views; Where it would adversely affect the appearance or environment of a conservation area. Applications affecting a conservation area should identify the significance of any heritage assets. Proposals should: Reinstate features and elements that have been lost; Remove modern additions or modifications to reveal the significance of heritage assets. Complement the conservation significance of heritage assets. 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a design management policy, which protects the character and appearance of conservation areas by setting conditions for development. This does not have an impact with regards to the HRA. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.
Policy HE5 'Buildings of local interest'	 This policy seeks to protect buildings of local interest. Development will not be supported if it: Involves the demolition or partial demolition of buildings of local interest unless replaced by equal or better quality; Would have an adverse impact on buildings of local interest or removes/masks major features of interest; 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which preserves buildings of local interest. This policy does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.

Policy HE6 'Historic parks and gardens'	 Would have a detrimental impact on the setting of the building or damage traditional boundary treatments, floor space materials or other features. The council will be responsible for maintaining a list buildings of local interest This policy preserves historic parks and gardens by Resisting development which would adversely affect them Seeking to conserve their landscape and architectural features; Resisting development which would impair views of the sites and their wider setting; Encouraging the restoration of original layout and features. 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which preserves historic parks and gardens. This policy does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from
Policy HE7 'Scheduled monuments and archaeology'	This policy protects scheduled ancient monuments, other sites of international, national, regional or particular local archaeological importance and their settings. This policy states resistance to development that would adversely affect these sites and their settings Where archaeological remains are known to exist or are likely to exist, development requires an assessment of the site's archaeological features. If development is considered to be acceptable it will require that: archaeological remains are preserved in situ Where in situ preservation is not justified or proves impractical or inappropriate, provision will be made for its recording and/or excavation by a competent archaeological organisation.	Appropriate Assessment.There are no Likely Significant Effects of this policy on Habitats Sites.This is a policy, which ensures the protection of archeologically significant artifacts and monuments. This policy does not set any quanta or allocations for development.There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.
Policy ML1 'Mineral safeguarding'	 Policy sets mineral safeguarded areas and protections for them including the following. Mineral safeguard areas cannot be developed unless: The development cannot be sited or relocated to avoid mineral areas; Mineral resources of economic value are not present The mineral can be extracted without unacceptable impacts before development; The need for the development outweighs the need to safeguard the mineral resources; 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which safeguards certain areas for the extraction of mineral resources. It does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.

	 The development is temporary and the site can be restored to enable extraction within the timescale that the mineral is needed. Major development proposals within the urban areas abutting a Mineral Safeguarding Area should demonstrate: That the mineral resource is not economic to work or is not present; That the proposed development will not prevent mineral extraction; That the mineral resource will be extracted prior to development; All non-mineral development proposals outside the Mineral Safeguarding Areas where the potential for prior extraction to take place has been identified should seek to extract any viable mineral resources present in advance of construction. In the urban and rural areas the council will support non-mineral development providing it does not threaten, lead to the loss of or damage to, the functioning of established planned or potential minerals related infrastructure. Applications for non-mineral and non-waste related development adjacent to existing, planned or potential mineral related infrastructure will be supported provided it can be demonstrated that it will not prevent or prejudice the current or future use of the mineral related infrastructure. 	
Policy ML2 'Maintaining aggregate supplies'	 This policy specifies that proposals for crushed rock, clay or sand and gravel working are only supported if: The need for the mineral outweighs the material planning objections Working would prevent the sterilisation of the resource; Significant environmental benefits would be obtained. Proposals for new extraction should demonstrate that they are environmentally acceptable. 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which set criteria for the extraction of crushed rock, clay and sand. This policy sets no quanta or location for development and extraction. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.
Policy ML3 'Mineral development'	 This policy supports the extraction of mineral resources and their processing and associated development if it doesn't have an unacceptable impact on: Local amenity (including noise levels, air quality and dust emissions, light pollution and vibration); Water within water courses, groundwater and surface water; Drainage systems; 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which supports the redevelopment and refurbishment of existing housing estates. It does not set any quanta or allocations for development.

	 Farming, horticulture and forestry (including the soil resource from the best and most versatile agricultural land) The safety and capacity of the road network; Public Open Space, Public Rights of Way and outdoor recreation facilities; The landscape, countryside and visual environment and local features that contribute to distinctiveness; Land stability; The natural and geological environment (including biodiversity and ecological conditions for habitats and species); The historic environment including heritage and archaeological assets. 	There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.
Policy ML4 'Land stability'	 This policy sets out criteria for the support of proposals in areas with land stability concerns. These criteria include: The submission of a land stability report, with appropriately detailed ground investigation, stability calculations, remedial design calculations, appropriately prepared reports and slope stability declaration form. Not exacerbating any land or slope stability issues The development can tolerate the ground conditions by design without adverse effects; All calculations and design shall be carried out to appropriate standards and acceptable demonstrable Factors of Safety; Developments and structures on filled land have long-term stability; 	There are no Likely Significant Effects of this policy on Habitats Sites. This is a policy, which makes the council work with developers and owners to resolve issues causing stalled development. It does not set any quanta or allocations for development. There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.
Policy ML5 'Land contamination'	Policy sets out factors for consideration when redeveloping previously developed land. These factors include: Safeguarding future users or occupiers of the site and neighbouring land;	There are no Likely Significant Effects of this policy on Habitats Sites.This is a policy, which supports self-build and custom housing. It does not set any quanta or allocations for development.

Protecting development from unacceptable levels of soil contaminants and preventing them contributing to this. Protecting buildings and services from hazards Preventing unnecessary dispersal or disturbance of contaminants	There are no impact pathways that link this policy to Habitats sites. Therefore, the policy is screened out from Appropriate Assessment.
A site investigation report and risk assessment.	

HRA of the Telford and Wrekin Regulation 19 Local Plan

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