

WMRSS Phase Three Workstreams –
Habitats Regulations review of
Tourism Policy Recommendations
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SUMMARY

This report presents an interim HRA view of policy recommendations relating to Phase 3 of the West Midlands Regional Spatial Strategy, which are to be taken forward, along with many others in the emerging Regional Strategy.

The assessment is provisional as the policy recommendations represent a stage in the process and are not finalised. It is intended to inform further development of policy, to help ensure that adverse impacts on European sites are avoided. An RSS Phase 3 Screening Report (TEC, 2009) screened all emerging Phase 3 policies against European Sites at the options consultation stage in summer 2009. This report builds on that screening report.

This interim response is released, exceptionally, in advance of consultation with the competent nature conservation agencies, in order to inform the Regional Assembly's compressed decision making timescales. It examines the relationships between policies and European Sites through assessment of potential policy impacts and their interaction with site sensitivities. Full assessment requires quantitative analysis of impacts and sensitivities, and precise information on spatial relationships. These parameters are not always available, and many assessments must be described as potential significant effects.

The majority of the policy recommendations are not spatially specific within the region. Consequently, most cannot be fully appraised against effects on European. In some cases more precise policy wording or mapped information in support of the policy will emerge later allowing fuller appraisal. In many other cases appraisal must be deferred to more local level, where LDFs and other plans will express policies spatially.

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1 Introduction

The West Midlands Regional Spatial Strategy (WMRSS) Phase 3 Revision is to be taken forward into the new Regional Strategy through Interim Policy Statements that will provide guidance to assist the preparation of Local Development Frameworks and Policy Recommendations. Treweek Environmental Consultants (TEC) was appointed by the West Midlands Regional Assembly to consider the possible implications of these Policy Statements and Policy Recommendations for European Sites. This report identifies key constraints and issues that need to be taken into account when developing the Phase 3 Policy Recommendations further. HRA will be required for the new Regional Strategy (RS) and this report will assist in identifying likely significant effects.

The report presents conclusions concerning possible impacts of the following Policy Recommendations:

- Culture, Sport and Recreation
- Climate Change Mitigation
- Flood risk
- Biodiversity
- Environmental Quality
- Water Resources

It also reviews the implications of the Policy Statement relating to provision of sites and pitches for gypsies and travellers. Implications of the new Regional Policy Statement on Minerals and Aggregates are addressed in a separate report.

In reviewing the recommendations, we have considered the conclusions of the Habitat Regulations Assessments (HRAs) carried out for the WMRSS Phase 2 Preferred Option (TEC, 2007) and the HRA Screening Report produced for the WMRSS Phase 3 (TEC, 2009) and also the results of consultation on these reports.

The report (in this chapter) summarises the Draft Policy Statement on RSs to show how implications for European Sites (as identified in this report) might be taken forward.

Chapter 2 summarises the policy recommendations which have been considered and Chapter 3, the European Sites included in the assessment. Chapter 4 presents results and recommendations concerning any modification of policy or other mitigation that might be required.

Sensitivity of European sites to different categories of impact are summarised in Appendix 1. Appendix 2 considers the potential impacts of the policy recommendations in relation to these.

1.1 The Draft Policy Statement on Regional Strategies

The Draft Policy Statement on Regional Strategies says that Regional Strategy's policies and priorities should include the issues summarised in Table 1, which also explains where implications for European Sites could be addressed.

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Table 1 Summary of issues to be covered by the new Regional Strategy

Issues identified in the Draft Policy Statement on Regional Strategies	How HRA requirements might be addressed through these issues
1. An overview of the key regional and sub-regional opportunities and challenges over the period of the Strategy, covering economic, environmental, social, health and well being, infrastructure and spatial characteristics and needs (including equality and diversity) across the region (urban and rural).	Challenges of maintaining the integrity of European Sites could be addressed in the overview. The current state or condition of sites could be referred to, and the main threats to their integrity identified.
2. How sustainable economic growth can be best delivered, taking into account employment and the key drivers of productivity - innovation and knowledge transfer, skills, enterprise, investment and competition.	Implications for European Sites in terms of how sustainability is defined. Dependence on Issue 7 to ensure that any particular requirements are addressed while delivering economic growth.
3. How the region will meet its housing need and demand and achieve a wide choice of high quality and suitable homes in good repair across both new and existing stock to create sustainable, well-connected and inclusive mixed communities.	Limited scope to consider implications for European Sites, but significant effects possible depending on success in achieving sustainable communities.
4. Proactive and innovative actions on climate change and energy, through a strategy that makes a significant contribution to climate change mitigation and helps meet the Government's greenhouse gas targets and carbon budgets, as well as the Government's objectives on adapting to the impacts of climate change.	Requirements for climate resilient networks of habitat also have implications for the integrity of many European Sites in the region. Furthermore climate change could have significant implications for the integrity of many European Sites. Increased pressure on the Severn Water Resource Zone is one issue already been identified as requiring further consideration in future. Other riverine SACs in the region and in Wales are also vulnerable to effects of climate change and their requirements should be factored into any strategies for climate mitigation.
5. Identification of areas or communities within the region that should be a priority for economic growth, regeneration and investment. Areas should be identified, based upon relative deprivation, worklessness, economic and environmental inequalities, health and social inequalities, social exclusion, skills levels, housing stock and the adequacy of infrastructure provision.	No scope to consider implications for European Sites.
6. How the Strategy's plans for sustainable economic growth, housing and other development have taken account of available infrastructure, including environmental infrastructure, its capacity and what strategic requirements, demand reduction, management and provision of infrastructure and services are needed to support future development of the region, including transport, waste, water and minerals.	This requires consideration of environmental limits, including the proximity of European sites to any damage thresholds.
7. Priorities for protection, enhancement and access to the built and natural environment, including biodiversity.	Clear requirement to ensure that any priorities for environmental enhancement and protection are set with the needs of European Sites in mind.
8. Priorities for widening access to culture, media and sport.	Possible conflicts with priorities established in (7) above need to be considered.
9. Other action essential to support outcomes.	

1.2 Requirement for Habitats Regulations Assessment of Development Plans

The European Habitats Directive (European Communities, 1992) requires assessment of the possible effects of certain plans on the integrity of 'European Sites' before the plan is adopted. The overall process of determining whether a plan complies with the requirements of the Habitats Directive is referred to as 'Habitats Regulations Assessment'.

In this context, 'European sites' - comprise:

- Special Areas of Conservation (SACs) and Candidate Special Areas of Conservation (cSACs), for habitats;
- Special Protection Areas (SPAs), for birds and potential Special Protection Areas (pSPAs) ; and also
- Sites designated under the Ramsar Convention as wetlands of international importance.

The purpose of HRA is to determine whether a proposed plan might have adverse effects on the integrity of any European Site, taking into account the reasons why a site was designated and its 'conservation objectives'.

Article 6(3) of the Directive requires an assessment of the effects of any plan or project (which is not directly connected with, or necessary to, the management of a site). This assessment must consider effects of the plan itself and its possible effects in combination with other plans or projects. In the light of the conclusions of the assessment, the competent national authorities can agree to the plan or project only when they have ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.

Article 6(4) of the Directive discusses alternative solutions, the test of "imperative reasons of overriding public interest" (IROPI) and compensatory measures:

"6(4) If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted."

European guidance recommends that HRA should be undertaken in four stages:

- 1 Screening: Determining whether the plan - 'in combination' with other plans and projects - is likely to have an adverse effect on any European site
- 2 Appropriate Assessment: Determining whether, in view of the site's conservation objectives, the plan - 'in combination' with other plans and projects - would have an adverse effect (or risk of this) on the integrity of European site (s). If it doesn't, the plan can proceed.
- 3 Assessment of alternative solutions: Where the plan is assessed as having an adverse effect (or risk of this) on the integrity of any European site, there should be an examination of alternatives.
- 4 Assessment where no alternative solutions remain and where adverse impacts remain: The 'IROPI test' and compensatory measures (European Commission, 2001).

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The end-product of the process as a whole is a statement which concludes whether or not the plan will affect the integrity of any European site. The assessment process can be stopped after any of these stages if it is found that the plan (revised if necessary) will not adversely affect the integrity of any European site. This report relates to the second stage and could result in suggestions concerning the need for alternative solutions in cases where adverse effects on the integrity of a European site cannot be ruled out.

1.3 Approach

An iterative process of review was adopted to allow the WMRA to take account of possible implications for European Sites during development of Policy Statements and Recommendations. The HRA was undertaken in parallel with Sustainability Appraisal (SA) carried out by Ursus (2010). Interim Policy Statements & Policy Recommendations were reviewed and amended based on results of consultation as well as the findings of the HRA and SA.

Relevant information was obtained from previous HRA work undertaken in the region, the JNCC website (<http://www.jncc.gov.uk/>) and other sources in the literature as well as through consultation with the statutory nature conservation bodies and the Environment Agency. Suggestions for avoidance or mitigation of effects on the integrity of any European site are included in the report.

The process of assessment used in the preparation of this report is summarised in Figure 1.

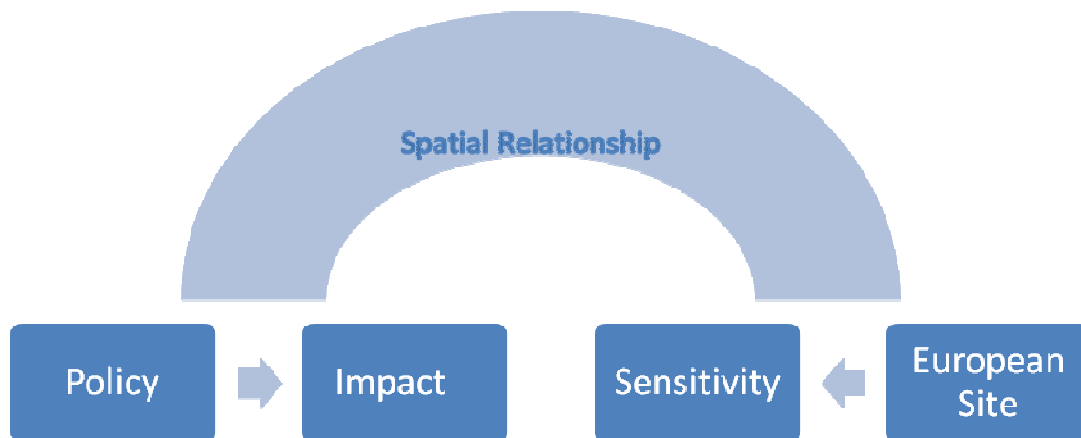


Figure 1 Assessment Process Summary

European Sites vary in their sensitivities to the impacts associated with changes in policy. Significant adverse effects on site integrity may occur where a policy generates impacts affecting sites which are sensitive to those impacts. Significance of effects varies with the type and magnitude of impact, the specific vulnerabilities of a site's designated interest features and in some cases on the proximity of the site to a likely source of impact (see Figure 1).

Direct impacts (occurring because the proposed development site is within a European site, for example) are relatively straightforward to assess. Most potential impacts, however, are indirect or have sources off-site. For some of these impacts, it may be possible to identify an area or "impact zone" beyond which it is highly unlikely to be significant. While the locations and boundaries of European Sites are known precisely, however, the spatial precision of

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policy recommendations is highly variable and mostly poor. In this report, impact zones have been defined where possible given the level of spatial definition available. For other impacts, particularly those with several, diffuse sources, it may be difficult to conclude with any certainty whether or not a particular site's interest features will be exposed or affected to any significant extent.

2 The West Midlands RSS

The RSS for the West Midlands was published in June 2004, and became a statutory development plan in September 2004. The current revised RSS, containing amended policies relating to the Black Country, was published in January 2008.

The purpose of the RSS is to guide the preparation of local authority development plans, local waste plans and local transport plans, so that together they can provide a coherent framework for regional development up to 2021.

When the RSS was published in June 2004, the Secretary of State supported the vision and objectives of the strategy, but suggested that several issues needed to be developed further by the Regional Planning Body (the West Midlands Regional Assembly). Given the range of matters to be considered, it was agreed that these issues should be looked at in three phases, as follows:

- Phase 1, Black Country Study, a plan for the long-term change and development of this sub-region including the City of Wolverhampton and the Boroughs of Walsall, Sandwell and Dudley, begun in February 2005, submitted to the Secretary of State in May 2006, and completed in January 2008 when the revised RSS was published.
- Phase 2, including housing needs, urban capacity, employment land, airports, road user charging and waste management, began in November 2005. A Preferred Option and Policies were submitted to the Secretary of State on 21 December 2007. Government Office West Midlands (GOWM) is currently setting out the Secretary of State's proposed changes to the WMRSS Phase 2 in response to the EiP which was completed in June 2009.
- Phase 3 (this phase) started in November 2007, with the launch of the Draft Project Plan.

2.1 Summary of approach to Phase 3

The process of developing policies for Phase 3 of the West Midlands Regional Spatial Strategy has had two distinct phases:

1. Development of Policy Options.

Development of options for RSS3 policies began in October 2008, led by the WMRA Policy Leads team. Policies were drafted, reviewed, and redrafted in an iterative process. A final set of policy options were developed in February and March 2009, and outlined in a consultation document entitled West Midlands Regional Spatial Strategy Phase Three Revision – Options (known as the 'Phase Three Options Paper'). This paper was submitted to the Assembly Board of Directors on 25 March 2009, and issued for public consultation on 29 June 2009. A Habitats Regulations Assessment screening report was issued for consultation at the same time.

2. Development of Policy Statements and Recommendations.

Following consultation on the policy options, it was decided at a 'stock-take' meeting on 9 September 2009 involving WMRA, Government Office West Midlands and Advantage West Midlands that RSS3 would be taken forward through the new Regional Strategy rather than

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the RSS. Interim policy statements would be developed to provide guidance for the preparation of LDFs, and policy recommendations would feed into the development of the Regional Strategy. Development of draft policy statements and recommendations began in November 2009. Statements and recommendations were drafted, reviewed and redrafted in an iterative process. Final draft policy statements and recommendations were developed in January 2010 for publication and consultation beginning in February 2010.

The proposed Policy Recommendations form part of the preparation process for the new Regional Strategy. Policy statements will have material consideration status in the planning process pending their incorporation into the Regional Strategy.

The implications of the draft policy statements and recommendations for European sites were reviewed in an iterative process to ensure that they were taken into account during policy development. This report presents the results of this review for consultation.

2.2 Summary of policy recommendations

This section provides a brief overview of the main areas of policy for which recommendations have been developed to feed into the new RS (Ursus, 2010) and considers, in general terms, the extent to which they are likely to generate impacts on European Sites. Impacts on the integrity of European Sites are considered in more detail in Chapter 4.

2.2.1 Rural Services

80% of the region is rural and contains 20% of the population. Policies relate to the overall goal of providing rural services that enable rural areas to be resilient, sustainable places to live and work. Likely impacts on European Sites relate largely to transport and housing development which are expected to be dispersed throughout the region.

2.2.2 Culture and Sport

The West Midlands has generally low rates of participation in cultural, sporting and recreational activities. Policy Recommendations suggest how opportunities might be better developed and promoted. One of the key factors identified as a constraint to further participation is transport accessibility. Any changes in transport provision could have implications for European sites. Some of the region's European sites are important recreational assets and people from the West Midlands also travel to European sites in neighbouring regions of England and in Wales.

2.2.3 Tourism

The Phase Three Revision aims to strengthen regional policy to meet tourism needs of the Region and to support sustainable economic growth and regeneration. The recommended policy is intended to set a framework which promotes economic growth in the sector, while contributing to sustainable development and climate change objectives. People from the West Midlands travel to European sites in neighbouring regions of England and in Wales and some sites are in neighbouring regions, requiring a collaborative approach. Many sites in the West Midlands, neighbouring regions of England and in Wales are subject to increasing pressure due to increasing numbers of visitors and associated physical damage, disturbance and pollution.

2.2.4 Integrated Approach to Management of Environmental Resources

In parts of the region, environmental quality, landscapes and the historic environment are coming under increasing pressure from development, leading to change inconsistent with its

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character (Ursus, 2010). With future increases in the levels of housing development, this trend is likely to increase unless there is a step change in the quality of new development and mitigation of its impacts. Most European sites rely on appropriate management of land outside their boundaries to maintain the habitats and populations of species for which they are designated. Actions taken to improve environmental quality are likely to be generally beneficial in this regard. An integrated approach is also likely to be beneficial.

2.2.5 Quality of the Environment Policies

The integrated approach introduced in the previous section is intended to bring together several specific policies, all of which are intended to contribute towards improved environmental quality. They include policy recommendations on:

- Green infrastructure
- Protection and enhancement of the historic environment
- Conservation, enhancement and restoration of the region's landscape
- Protecting, managing and enhancing the region's biodiversity and geodiversity
- Trees, woods and forestry
- Protection of agricultural land
- Air quality
- Energy efficiency
- Renewable energy (targets and criteria for ensuring renewable energy is appropriately located)
- Positive use of the green belt

Many of these areas of policy have potential benefits for European sites, but this does not mean that adverse effects on European sites are not also possible. Policies relating to air quality and energy efficiency have implications for all sites which are affected by diffuse air pollution and there may be some instances where stronger policy is required to ensure that site-specific risks can be addressed. Land use in areas surrounding European sites can have a significant influence on the threats and pressures affecting them and the extent to which integrity can be sustained. Changed land use in the green belt or on agricultural land could have significant effects on European sites in some cases.

2.2.6 Safeguarding mineral resources in the West Midlands

The key issue addressed by minerals policy in the region is to safeguard minerals resources as far as possible, by ensuring that resources are not 'sterilised' by surface development.

2.3 Summary of policy statements

There are two areas of policy which will be taken forward into the new RS as Policy Statements.

2.3.1 Sub-regional apportionment for minerals and aggregates

The implications of the sub-regional apportionments for European Sites are considered in a separate report.

2.3.1 Gypsies and Travellers

There is currently a major shortage of accommodation for Gypsies and Travellers, with 1,729 caravans in the Region but only 1,166 authorised pitches. Over the first five years of any plan to provide for Gypsies and Travellers accommodation needs, an additional 685 pitches would be required to address current shortages and meet new demand (based on expected family formation), increasing the provision of pitches across the Region by 59%. A further 287 pitches would be required over the next five years to meet expected demand (based on expected family formation). As a general rule, impacts on European sites would be location-specific, but there are also possible in combination effects of changes in the West Midlands for neighbouring regions in England and in particular in Wales.

3 European Sites

European Sites considered in this assessment are listed in **Table 2**. This includes sites identified during the WMRSS Phase 3 Revision Screening process and some further sites added following consultation with Natural England and the Countryside Council for Wales carried out as part of the screening process and subsequently.

Each European site has a set of designated interest features for which it is selected, as well as conservation objectives set by the conservation agencies. These have been fully described in earlier reports and are not repeated here (TEC, 2008; TEC, 2009a; TEC 2009b).

Appendix 1 summarises site sensitivities to different types of impact, based on the categories used by JNCC for Article 17 reporting.

Table 2: European sites to be considered

SAC	SPA	Ramsar
Berwyn and South Clwyd Mountains SAC	Elenydd Mallaen SPA	Humber Estuary Ramsar
Brecon Beacons SAC	Humber Flats, Marshes and Coast (Phase 2) SPA	Midlands Meres and Mosses Phase 1 Ramsar
Bredon Hill SAC	Peak District Moors (South Pennine Moors Phase 1) SPA	Midlands Meres and Mosses Phase 2 Ramsar
Brown Moss SAC	Severn Estuary SPA	Severn Estuary Ramsar
Cannock Chase SAC	South Pennine Moors Phase 2 SPA	Walmore Common Ramsar
Cannock Extension Canal SAC	Walmore Common SPA	
Dixton Woods SAC		
Downton Gorge SAC		
Elan Valley Woodlands SAC		
Elenydd SAC		
Ensor's Pool SAC		
Fens Pools SAC		
Fenn's, Wixhall, Bettisfield, Wem and Cadney Mosses SAC		
Llangorse Lake SAC		
Lyppard Grange Ponds SAC		
Montgomery Canal SAC		
Mottey Meadows SAC		
Pasturefields Saltmarsh SAC		
Peak District Dales SAC		
Rhos Goch SAC		
River Clun SAC		
River Dee and Bala Lake SAC		
River Mease SAC		
River Usk SAC		
River Wye SAC		
Severn Estuary SAC		
South Pennine Moors SAC		
Sugarloaf Woodlands SAC		
The Stiperstones and the Hollies SAC		
West Midlands Mosses SAC		
Wye Valley and Forest of Dean Bat Sites SAC		
Wye Valley Woodlands SAC		

Table 3 summarises the main conclusions of the screening assessment for WMRSS Phase 3 in terms of the European sites which could be affected and the main drivers for adverse effects. This has been amended based on the results of consultation on the Screening report (TEC 2009b) but does not refer to sites for which possible effects have been identified as part of the subsequent review and consultation. The revision topics presented in the table relate to but are not identical to those covered by the Policy Recommendations.

Table 3 Phase 3 Revision Topics and European sites affected

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Phase 3 Revision Topics	Key drivers for adverse effects	European Sites which could be affected
Rural Renaissance – Critical Rural Services	Diffuse and/or local air pollution largely due to changes in transport patterns, which are difficult to predict.	Many, likely to include at least: Berwyn & South Clwyd SAC, Elenydd Mallaen SAC/SPA, Brecon Beacons SAC and Elan Valley Woodlands SAC Bredon Hill SAC, Cannock Chase SAC, Dixton Wood SAC, Downton Gorge SAC, Fenns, Wixhall, Bettisfield, Wem and Cadney Mosses SAC, Peak District Dales SAC, South Pennine Moors SAC, The Stiperstones and the Holley SAC, West Midlands Mosses SAC, Wye valley Woodlands SAC, Peak District Moors SPA, South Pennine Moors Phase II SPA
Communities for the Future – Sites for Gypsies, Travellers and Travelling Showpeople	Localised impacts, largely related to disturbance and possibly a variety of other impacts including localised littering and pollution.	Number of sites potentially affected varies under the two consultation options. Possible additional pitches in Cannock District could have implications for Cannock Chase SAC. Significant effects unlikely, but sensitive locations near European Sites should be avoided. It may be sufficient to flag this as a constraint for consideration at more detailed levels of planning. An indicative distance/ limit (for example 10km) could be assigned which might indicate the need for more detailed assessment.
Culture, Sport and Tourism - To identify and address gaps in the provision of international, national, regional and sub-regionally significant cultural assets.	Disturbance, transport-related pollution, localised physical damage.	Sites vulnerable to adverse impacts from further recreational use likely to include South Pennine Moors SAC; Peak District Dales SAC; River Wye SAC; Cannock Chase SAC; Cannock Extension Canal SAC; Midlands Meres and Mosses; The Stiperstones and the Holley SAC; Peak District Moors (South Pennine Moors Phase I) SPA. Sites in Wales include the River Dee and Bala Lake SAC and Berwyn and South Clwyd Mountains SAC/SPA.
Quality of the Environment – development of policies which include flood risk, air quality, renewable energy and Green Belt	Scale of development in the Region could have implications for many European Sites in the region, but there is also scope to use options under this topic to make European Sites more resilient to effects of changes in land use. Some other policies could have adverse effects (below).	All sites
Development of renewable energy	Could have impacts on many European sites from land-take, disturbance and mortality related to development of energy infrastructure and ancillary and induced development.	Not clear which sites as no spatially explicit proposals at this stage.

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Policies on biodiversity (e.g. QE7)	Will have beneficial effects by promoting development of resilient natural systems across the Region, promoting a landscape scale approach and the linking of fragmented habitats	All sites, but particular benefits to sites supporting species which range outside the site, such as the Wye Valley and Forest of Dean Bat Sites.
Green Belt	Opportunity under Option 2 to help buffer European sites by providing supporting habitat and other environmental services important for the integrity of European Sites.	Some sites are located in or near the Green Belt and could be affected by any changes in land use within it. These include: Cannock Chase SAC, Cannock Extension Canal SAC, Ensor's Pool SAC, Fens Pool SAC, Motte Meadows SAC.
Management of flood risk (possible new policy)	Altered hydrological or flooding regime, pollution caused by contaminants from urban surface water runoff flowing directly into water courses.	Needs further consideration due to implications of changes in surface water flooding for European Sites, in particular Pasturefields Saltmarsh SAC, Cannock Extension Canal SAC, West Midlands Mosses SAC, Midlands Meres and Mosses Phases I and II Ramsar. riverine SACs (River Mease, River Wye, Rivers Usk and Dee) and the Severn Estuary sites.
Minerals: development of policies on safeguarding mineral resources and the future supplies of construction aggregates and brick clay	Land take, disturbance, change in water levels and water pollution arising from future workings. Possible air pollution related to transport and local dust deposition.	Sites affected depend on need for new workings as opposed to expansion of existing. Sites near existing minerals extraction locations include Peak District Dales SAC, Staffordshire Moorlands SAC, River Mease SAC, River Wye SAC, Midlands Meres and Mosses Phases I and II Ramsar, Severn Estuary SAC, SPA, Ramsar.

4 Results and recommendations

This chapter summarises the results of the HRA process and makes recommendations for further development of policy to avoid adverse effects on the integrity of European sites. For each area of policy, Appendix 4 presents summary tables which include summaries of policy objectives and the recommended policy approach, the sites affected and possible adverse effects.

4.1 Rural Services

80% of the region is rural and contains 20% of the population. Policies relate to the overall goal of providing rural services that enable rural areas to be resilient, sustainable places to live and work. The recommended policy approach is to develop a strategic framework for rural services which will deliver “inclusive communities as part of a living working countryside”.

This framework is intended to strengthen and coordinate other existing policies, including those developed as part of the WMRSS Phase 2. These emphasise the need to provide affordable housing and to develop the services required to support local regeneration.

The policy recommendations already emphasise the need for a strong emphasis on local access to services and sustainable transport solutions. The main recommendation feeding into the Regional Strategy is to embed “bottom up” planning approaches which meet locally identified needs.

4.1.1 Summary of issues identified through HRA

Impacts on sites could be varied and many sites could be affected, depending on the spatial distribution of new development delivered through this policy. No site-specific impacts have been identified.

The overall emphasis of policy is largely beneficial to European sites, because it promotes local service provision and other provisions which should reduce the need to travel by car. However the policy recommendations are not sufficiently specific in terms of the measures that might result or their spatial application for detailed assessment of implications for European sites to be possible at this stage.

4.2 Culture and Sport

The policy recommendations state that provision of cultural facilities and events should use sustainable transport (lower air pollution) and take place in a sustainable manner.

Specific reference is made to the role of Birmingham as a global city and to the development of “new culture and sports assets where national, regional, sub-regional and local assessments indicate shortfalls in supply or where innovative viable opportunities are proposed”.

4.2.1 Summary of issues identified through HRA

With respect to HRA, it would be appropriate for such initiatives to be appraised at a later stage in the planning process when implications for any European sites can be considered in more detail. In general, given the low coverage of European sites in the region and the non-specific spatial requirements for such facilities, the avoidance of adverse impacts should be possible. There is no reason why the policy recommendations need necessarily result in any

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adverse impact on a European site and it is possible that increased access to cultural and sporting activities might reduce pressure on European sites by providing alternative opportunity for recreation and amenity.

However further development of policy for Culture, sport and tourism should take into account the overall availability of open space, main parks and other recreational resources in the region and how this might affect pressure on European sites. Proposals to develop opportunities for improved access to sporting and cultural sites should be developed with a view to avoiding further contributions to diffuse air pollution in the region.

4.3 Tourism and the Visitor Economy

The main aim is to strengthen regional policy to meet the strategic, sporting and tourism needs of the Region and to support sustainable economic growth and regeneration. Consultation on policy recommendations revealed demand for a separate policy on tourism (previously combined with culture and sport) and for closer alignment with the region's Visitor Economy Strategy. There are strong economic drivers for development of tourism in the region.

The policy recommendation makes specific reference to recognised hubs of visitor activity, in particular South Warwickshire, Ironbridge Gorge World Heritage Site and Birmingham City Centre. It is recognised that significant flows of visitors create can increase pressure on environments and on local infrastructure. The policy recommendations therefore stress that a sustainable approach to visitor management is required in order to maximise benefits and minimise potential conflicts.

4.3.1 Summary of issues identified through HRA

In addition to the locations identified above, the Policy recommendations refer to the Wye Valley, the Cotswolds, the Shropshire Hills, Cannock Chase AONB and the Peak District National Park. There are several European sites which are affected by already and for which specific safeguards might be required when policies are further developed in the RS.

At present approximately 90% of visitors to the West Midlands are on day trips. It may therefore be possible to determine the likely distance travelled from key urban centres to European sites and to identify zones within which increased housing development, together with initiatives to promote tourism might increase visitor numbers to sites which are already under significant pressure.

Implications of tourism on European Sites are summarised in Table 4.

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Table 4 Implications of Policy on culture, sport and tourism for European sites

Draft principles	Implications for European Sites
<p>1. Regional policy for tourism and the visitor economy should continue to retain a clear focus on promoting sustainable economic growth and regeneration and contributing to the creation of sustainable communities, through attracting additional and higher value tourism activity, whilst protecting and enhancing the environment. In addition to being a source of sustainable economic growth and regeneration, tourism and culture can make a significant contribution to the region's image and reputation.</p>	<p>The meaning of "sustainable economic growth" is ambiguous in this context. It is unclear whether the word sustainable is being used in the context of "consistent over a period" or in the environmental sustainability context. "Attracting additional tourism activity" suggests that the former meaning is intended, and that this policy will lead to increased tourism activity, with possible implications for several European sites.</p>
<p>2. The visitor economy affects most parts of the region. In addition to setting a strategic framework for policy development and sustainable economic growth at sub-regional and local levels, policy at regional level should focus on key assets and destinations.</p>	<p>This states that regional policy should concentrate on key assets and destinations, and yet there is currently no definition of these. If these are specified, it will be possible to consider implications for European sites based on zones within which increased day visits are likely, for example.</p>
<p>3. A clear understanding of the key characteristics of the sector, the spatial distribution of key strategic assets and visitor demand/activity patterns is required as the basis for regional policy. Policy content at regional level should identify strategic opportunities and constraints for the sector, and set a policy direction which clearly recognises the need to facilitate sustainable economic growth, and key existing strategic assets in the form of;</p>	<p>Reference to European Sites should be made in policy in any case where these are defined as (or would be considered as) key strategic assets.</p>
<ul style="list-style-type: none"> · Key business and conference tourism hubs and venues. The region should continue to seek to capitalise on our world-class business tourism infrastructure and fully exploit our locational advantage and established high profile as a business destination 	<p>There is no information on locations of these hubs and venues. Their relationship to sustainable transport access is critical. Since car transport generates air pollution and several European Sites in the region are extremely sensitive to air pollution impacts, a policy principle should state that new business and conference tourism hubs and venues will only be supported with the highest standards of sustainable transport access.</p>
<ul style="list-style-type: none"> · Major visitor attractions 	<p>See above.</p>
<ul style="list-style-type: none"> · Leading cultural venues and museum 	<p>No adverse effects identified</p>
<ul style="list-style-type: none"> · Visitor destinations which are hubs of activity, including; South Warwickshire, Birmingham, the NEC complex 	<p>Birmingham, the NEC complex and South Warwickshire have good sustainable transport access. No adverse effects identified.</p>

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<ul style="list-style-type: none"> Leading sporting venues and events 	<p>Leading sports venues and events normally have good sustainable transport access. No adverse effects identified</p>
<ul style="list-style-type: none"> The countryside, canal network, and market towns/cathedral cities as hubs of activity 	<p>The countryside, canal network and market towns often do not have good sustainable transport access, and any policy to increase tourism activity in these locations should be contingent on the provision of high quality sustainable transport. Some canals are designated as European sites, notably the Montgomery Canal SAC in Wales and the Cannock Extension Canal SAC in the West Midlands. HRA will be required for any specific proposals affecting these sites and the Policy recommendation should make reference to possible risks to them associated with development of the network as a hub of activity.</p>
<ul style="list-style-type: none"> Leading heritage assets and environments, including Ironbridge Gorge World Heritage site 	<p>Many leading heritage assets and environments, including Ironbridge Gorge, need policy support to increase the proportion of visitors arriving by sustainable transport.</p>
<p>4. There are significant synergies with the region’s cultural and sporting infrastructure (ref. Cultural and tourism) – in particular, the major (regional, national and internationally recognised) assets which have a distinct appeal. Contemporary culture and the cultural heritage of the West Midlands is at the heart of the visitor experience, and is a key element in driving visitors to the region and growing short break opportunities.</p>	<p>No specific impacts</p>
<p>5. As an accepted part of the Region’s economy, it is recognised that tourism activity often generates travel and development. Tourism development should utilise and encourage sustainable and integrated transport solutions (in line with RSS Transport and Accessibility policies), sustainable construction and high quality design (in line with draft RSS Policy SR3) and take place in an environmentally sustainable manner (in line with the Quality of the Environment and climate change policies). An increase in visitor activity should seek to minimise negative environmental, transport and other impacts, and contribute to achieving climate change objectives, including by adopting cleaner energy and resource efficient practices. Wherever possible, tourism activity and development should be planned and informed by clear market intelligence. Tourism development is often product-led and frequently depends on a high standard of planning with landscapes, countryside, historic environment and design, forming key elements of the unique place-based character of destinations</p>	<p>This is beneficial but may not deliver the level of assurance required for certain European sites where promotion of tourism should be contingent on such solutions being in place.</p> <p>In cases where impacts on European sites which are already adversely affected by air pollution are likely, there should be a clear presumption against any new facility, or expansion of an existing facility that will lead to a significant increase in car travel, other than electric vehicles.</p>

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<p>6. High standards of transport and accessibility, wherever possible by sustainable modes, are of great importance to the visitor economy and the overall development of the region. This includes:</p> <ul style="list-style-type: none"> • Connections to other regions and the wider world through such gateways as Birmingham New Street, Birmingham International Airport, the potential High Speed Railway link to the South East, and the strategic road and rail network; • The provision of local infrastructure and services, including tourism and directional signage to key visitor assets and destinations. A consistent approach to applying signposting schemes across the region should be promoted; • Aligning public transport services and tourism flows, including by improving public transport services to and from visitor attractions at peak leisure and visitor times, especially at weekends and evenings; • Where major new facilities are planned these need to be located and planned, wherever possible, to promote the use of public transport, walking and cycling and to minimise the need to travel by private car, in line with the RSS Transport and Accessibility policies. 	<p>This area of policy is generally beneficial but not sufficiently strong in its promotion of the need for sustainable modes of transport.</p> <p>The reference to Birmingham International Airport is inconsistent with policy principle 4. It may also not be consistent with the objective to promote tourism activity in the region, as the evidence suggests that UK regional airports contribute a net loss to the regional tourism economy. (House of Commons Scrutiny Committee, 2009, Annex 2-Economic aspects of the future of aviation, http://www.parliament.the-stationery-office.co.uk/pa/cm200910/cmselect/cmtran/125/12513.htm), misguided policy may therefore result in both environmental and economic damage.</p> <p>There should be a clear presumption against any new facility, or expansion of an existing facility that will lead to a significant increase in car travel, other than electric vehicles. In cases where a European site is promoted as a tourist destination, there may be a need to demonstrate that there will be no local increases in air pollution if adverse effects on integrity are to be avoided.</p> <p>There are potential policy conflicts with policies relating to the quality of the environment and air pollution in particular. Also with policies required to tackle climate change at regional level.</p>
<p>7. In addition to encouraging appropriate new development, emphasis should be placed on the sustainable management of assets in the context of their whole environment experience and impacts, reflecting their importance to regional and local economies and regeneration. Complementary new facilities should be encouraged in line with market demand and other relevant policy considerations. At this time, no specific major new regional tourism development opportunity has been identified. However, tourism policy should enable appropriate major new opportunities to be embraced, in line with other regional policies.</p>	<p>HRA will be required for any specific proposal and the need to maintain the integrity of European sites may be a key consideration in delivering sustainable management of assets. It is important to note that some European sites are also seen as tourism assets.</p>
<p>8. Reinforcing the role of tourism and culture in supporting the development of Birmingham as a global city. Developing Birmingham as a premier European city break destination utilising contemporary culture, visitor attractions, the retail product, design and enhancement of the historic environment will further enhance its role as an international leader in the conference and exhibitions sector.</p>	<p>Such a policy can only be compatible with air quality and climate change policies if it encompasses a high speed rail link.</p>

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<p>9. The importance of the visitor economy to many rural areas, where activity by its character is more dispersed than in urban areas, but is proportionately more important in terms of business base and employment, should be recognised. Tourism and the visitor economy is a key source of diversification and regeneration for many rural communities.</p>	<p>No specific implications for European sites.</p> <p>Tourism and the visitor economy in rural areas should be stimulated through sustainable transport provision, including high quality public transport (e.g. retention and development of rural rail and bus services), electric car infrastructure, walking and cycling infrastructure.</p>
<p>10. At a local level, tourism can be used as a focus for regeneration and can help sustain the viability and vitality of local services such as shops, cafes, pubs and post offices. This is particularly important for rural areas, where managing and improving local tourist and visitor assets can also help to manage the potential pressures on the environment and townscapes resulting from visitor activity</p>	<p>No specific implications for European sites.</p>
<p>11. A reflection of the importance of the concept of destination experience. While key individual assets, including visitor attractions, cultural and heritage-based facilities are key attractors, the principle of high quality planning and design and management of spaces, within the context of an overall destination, is critical to success in the visitor economy.</p>	<p>No specific implications for European sites.</p>
<p>12. The sector should contribute to place building and the creation of environments which are attractive for businesses, investors and residents, and help to create a sense of place. The visitor economy and visitor demand can create demand for additional cultural, sports and leisure facilities that can help improve the quality of life for people living in the region. Similarly, visitor usage should be planned and promoted in a way which supports the care and management of historic and natural environments.</p>	<p>No specific implications for European sites.</p>
<p>13. Recognise the importance of a consumer-led approach to marketing, leading with products and destinations which have resonance with key visitor markets. An attractive marketing policy which leads with key attractors and brand messages provides opportunities to then showcase and raise awareness of the breadth of destinations and tourism assets throughout the region.</p>	<p>No specific implications for European sites.</p>

4.4 Integrated Approach to Management of Environmental Resources (Emerging Draft Policy Recommendation)

4.4.1 Proposed Policy

The draft policy recommendation is to develop an over-arching strategy for the protection, conservation, enhancement and management of regional environmental assets and resources, for their intrinsic value and wider social and economic benefits.

The results of consultation supported the development of such an over-arching policy, but also suggested the need for environmental principles to be embedded more strongly in Development Plan Documents. Consultation also supported the development of more ambitious policy, supporting enhancement (as opposed to damage limitation) in line with current planning policy guidance (eg, PPS9 Biodiversity and Geological Conservation stresses the requirement for enhancement and for demonstrable outcomes for biodiversity).

4.4.2 Possible Implications for European Sites

This area of policy could have considerable benefits for European sites in general through a range of policy measures relating to *inter alia* land use, biodiversity, water resources and climate change (see following sections). European Sites would benefit, for example, from a greater emphasis on enhancement, particularly through efforts to enhance biodiversity in the wider landscape and to create climate resilient habitat networks in the region. However there are also more specific requirements to maintain the integrity of some sites and it is important that these are recognised and that appropriate policies are in place to support necessary action.

4.4.3 Recommendations for mitigation or further action

To inform further development of policy, there is a need for:

- Better understanding of the impacts of air pollution on designated interest features of European sites
- Better understanding of the likely effects of climate change on the integrity of European sites, particularly riverine SACs
- Stronger efforts to ensure appropriate land use around European sites, possibly using green infrastructure initiatives as a delivery mechanism
- Stronger efforts to support European protected species outside European sites
- Integrated and partnership working to monitor and assess effects on European sites which straddle regional boundaries or are affected by development in more than one local area.

4.5 Other Policies relating to Quality of the Environment

Other environment policies associated with the draft overarching policy discussed above are being developed for the following:

- Restoring Degraded Areas & Managing & Creating High Quality New Environments
- Green Infrastructure
- Protection & Enhancement of Historic Environment

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- Conservation, Enhancement & Restoration of Region's Landscape
- Protecting, Managing & Enhancing Region's Biodiversity & Geodiversity
- Trees, Woods & Forestry
- Protection of Agricultural Land
- Water Environment*
- Air Quality
- Energy Efficiency
- Renewable Energy - Targets
- Criteria for Ensuring that Renewable Energy is Appropriately Located
- Positive Uses of Green Belt

*Policies on flood risk and the water environment may be included in the proposed changes to Phase 2.

4.5.1 Proposed Policies

The purpose of the Phase Three Revision is to update and align the existing "Quality of the Environment" policies in the WMRSS to ensure consistency with current national guidance and regional plans, strategies and initiatives.

4.5.2 Possible Implications for European Sites

These policies are generally beneficial for European sites. Implications for individual sites are difficult to appraise without more spatial information. The potential role of environment policies in delivering mitigation is particularly important with respect to green infrastructure (Policy QE4), Protecting, Managing & Enhancing Region's Biodiversity & Nature Conservation Resources (Policy QE7) and Positive Uses of the Greenbelt. Both these areas of policy provide scope for enhancing the supporting functions of land around European Sites. Policies on air quality and energy efficiency could also have a positive influence on the 13 sites in the region which are over their critical loadings for certain air pollutants.

Climate resilient habitat networks will become increasingly essential to maintain the integrity of European sites as the climate changes. In the same way that minerals can only be extracted where they occur, climate resilient habitat networks can only be designed and created where they will be ecologically effective. There are likely to be spatial conflicts between these and land-use change aspirations inherent in other regional policies. It is therefore extremely important that the concept is addressed in regional policy. This could be in this integrated environment section or in QE7.

There remains a need for a stronger evidence base to support future assessments of impacts on the integrity of European sites. There are some sites which require monitoring of the effects of traffic emissions from neighbouring major roads and others where monitoring is required to determine how levels of deposition of atmospheric pollutants translate into significant changes in plant community composition "on the ground".

4.6 Safeguarding Mineral Resources in the West Midlands

4.6.1 Proposed policy

The objective is to develop a policy for the safeguarding of natural building and roofing stone, aggregates, minerals and minerals-related infrastructure.

One of the national objectives for mineral planning is “to safeguard mineral resources as far as possible”, paragraph 9, Minerals Planning Statement 1 (MPS1).

The emerging policy recommendation states that “international and nationally designated areas and green belts should not be excluded in determining Mineral Safeguarding Areas and Mineral Consultation Areas”.

4.6.2 Possible Implications for European Sites

Sites near existing minerals extraction locations include:

- Peak District Dales SAC
- Staffordshire Moorlands SAC
- River Mease SAC
- River Wye SAC
- Midlands Meres and Mosses Phases I and II Ramsar

Implications for other sites depend on how the regional apportionment would be met, in particular likely locations for any new mineral extraction sites. This is the subject of a separate study. Safeguarding of mineral resources from other forms of development does not necessarily commit to extraction from those areas safeguarded. However it is important to note that mineral extraction from areas within European designated sites would not be possible unless it could be demonstrated through HRA that there would be no adverse impact on the integrity of those sites.

4.7 Future Brick Clay Provision

The objective is to develop a policy for the safeguarding of brick clays (including fireclays).

[TBC]

4.8 Regional Policy Statements

Regional Policy Statements are being produced for Gypsy and Traveller Pitch Provision and for the Sub-regional apportionment of minerals and aggregates.

4.8.1 Gypsy and Traveller Pitch Provision (Regional Policy Statement)

Until the Strategy for the West Midlands has been completed, the status of the Regional Policy Statement for new Gypsy and Traveller Pitch Provision has been confirmed by GOWM as having ‘similar weight to a submitted draft RSS’ and discussions with the Planning Inspectorate indicate that the Statement will ‘carry weight in both Development Plan Document (DPD) examinations and Planning Inquiries’.

The main objective is to address current under-provision in the region and therefore to increase the number of residential and temporary pitches available. Various options have been considered.

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Consultation revealed very mixed opinions concerning the total number of residential pitches required. WMRA has decided to retain 939 additional residential pitches as the planning total for the Region since it was based on the local authorities' Gypsy and Traveller Accommodation Assessments and represents the best and most robust evidence available. The Sustainability Appraisal noted that the provision of 939 extra pitches would be vital to ensure that the Gypsy and Traveller community would have access to decent housing, services and opportunities, and that issues around poverty and deprivation, health inequalities and poor health could be addressed. Three Options for how to allocate this total number were consulted on and were also considered in the HRA Screening Report (TEC, 2009). The latter concluded that Option 1 could have implications for some European sites, in particular Cannock Chase SAC and emphasised the need for any re-distribution (Option 3) to take implications for European Sites into consideration. The proposed approach to development of Option 2 already included European sites as a consideration.

With respect to transit pitches, the Regional Policy Statement retains the 244 additional pitches and the geographical distribution consulted on. Both were based on Gypsy and Traveller Accommodation Assessments undertaken by local authorities, and were considered to reflect best available evidence.

Table 5 presents the proposed allocations for residential and temporary pitches suggested in the Regional Policy Statement.

Table 5 Proposed allocation of pitches

Local Authority	Allocation 2007 - 2017	
	Transit pitches	Residential pitches
Staffordshire & Stoke:		
<i>Cannock Chase</i>	<i>5 pitches</i>	<i>35 pitches</i>
<i>East Staffordshire</i>	<i>5 pitches</i>	<i>15 pitches</i>
<i>Lichfield</i>	<i>5 pitches</i>	<i>14 pitches</i>
Newcastle-under-Lyme	5 pitches	20 pitches
<i>South Staffordshire</i>	<i>5 pitches</i>	<i>42 pitches</i>
<i>Stafford</i>	<i>2 pitches</i>	<i>37 pitches</i>
Staffordshire Moorlands	2 pitches	2 pitches
Stoke-on-Trent	10 pitches	40 pitches
Tamworth	5 pitches	7 pitches
Warwickshire:		
North Warwickshire	5 pitches	21 pitches
Nuneaton & Bedworth	5 pitches	29 pitches
Rugby	5 pitches	42 pitches
Stratford-on-Avon	10 pitches	42 pitches
Warwick	15 pitches	20 pitches
Worcestershire:		
Bromsgrove	0 pitches	14 pitches

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Malvern Hills	10 pitches	33 pitches
Redditch	18 pitches	13 pitches
Worcester	20 pitches	22 pitches
Wychavon	20 pitches	42 pitches
Wyre Forest	0 pitches	42 pitches
Birmingham, Black Country, Coventry & Solihull		
Birmingham	15 pitches	19 pitches
Coventry	5 pitches	20 pitches
Dudley	3 pitches	23 pitches
Sandwell	3 pitches	5 pitches
Solihull	5 pitches	26 pitches
Walsall	3 pitches	39 pitches
Wolverhampton	3 pitches	36 pitches
Herefordshire, Shropshire, Telford & Wrekin		
Herefordshire	10 pitches	109 pitches
Shropshire	35 pitches	93 pitches
Telford & Wrekin	10 pitches	37 pitches
REGIONAL TOTAL	244 pitches	939 pitches

In terms of implications for European sites, traveller pitches proposed in Districts and Boroughs adjoining Cannock Chase SAC will need careful consideration due to possible impacts on integrity associated with increased traffic and physical damage and disturbance (these are highlighted in ***bold italics*** in Table 5). Ecological studies commissioned by these Districts and Boroughs (Footprint Ecology, 2009) suggest that risks of impact on the integrity of the site could be significant for development within 8km of the site boundary which might increase levels of traffic or numbers of visitors to the site.

Otherwise impacts are likely to be localised and depend on precise location. An indicative distance of 10km (for a proposed pitch from a European site boundary) is suggested, within which more detailed consideration should be given to possible impacts of any proposed residential or temporary traveller pitches and also plots for travelling showpeople.

Reference is made in draft policy to potential use of land in the greenbelt in exceptional circumstances. Some European sites in the region are particularly vulnerable to changed land use in the greenbelt due to their location and the need for supporting habitat. Any land use changes in the following areas should be given careful consideration from an HRA perspective:

- Newcastle-under-Lyme District (Midlands Meres and Mosses Phases 1 and 2 Ramsar sites);
- Lichfield District (River Mease SAC);

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- Nuneaton and Bedworth District (Ensor's Pool SAC) and
- Worcester (Lyppard Grange Ponds SAC).

This should not be regarded as a comprehensive listing.

5 Summary of possible in combination effects of other plans

[TO BE COMPLETED]

5.1 Rural Services

5.2 Culture and Sport

5.3 Tourism and the Visitor Economy

Several other plans and projects have been identified which could result in increased visits to European sites in the region. They include:

- The Rural Development Programme for England 2007-2013: pressures may increase on sites from promotion of increased public access
- Connecting to Success - West Midlands Economic Strategy: Increased visitor numbers and longer stays may subject sites to increased visitor pressure and disturbance.
- Cultural Life in the West Midlands - A Call for Action: Aims to promote new and existing 'cultural flagships' which may result in an increase in visitors to those sites.
- Revised West Midlands Visitor Economy Strategy: Most of the impacts will revolve around the effects of increased recreational use of the N2K sites. Increased use will result in physical and noise disturbance, in increased opportunities for casual littering and pollution.
- Rural Renaissance - Advantage West Midlands' Rural Framework: Although not specifically highlighted, appropriate rural economic activity may include tourism and recreation which could lead to increased pressure on protected sites.
- West Midlands Rural Delivery Framework First Iteration: The increase in tourism, sport and recreation in the National park and AONBs may lead to increased pressure from recreation and disturbance. Physical development of market towns and in the RRZ could lead to increased recreational pressure on sites in these areas.
- West Midlands Health and Well-Being Strategy: Increasing the number of people using the countryside and green spaces could increase pressure on N2K sites across the region.
- The Wales Spatial Plan, Wales Transport Strategy and the Development Wales Transport Plan all seek to improve accessibility and will help facilitate movement to European sites.

5.4 Integrated approach to the management of environmental resources

5.5 Quality of the environment policies

5.6 Safeguarding mineral resources and future brick clay provision

5.7 Policy Statements

6 Conclusions

[TO BE COMPLETED]

7 References

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8 Appendix 1 Sensitivities of European Sites

Table 6 indicates the recorded sensitivities of the European Sites considered in this report. These reflect key threats and pressures as recorded in “Information on Natura 2000 sites in the West Midlands (TEC, 2009), drawing on Natura 2000 site summary information and data forms submitted to the European Union. Note that local assessments vary in the degree to which recorded sensitivities also reflect current levels of impact: inclusion on this list does not necessarily mean that an impact is already occurring, or that any additional relevant impact will automatically compromise the integrity of the site. Similarly absence from this list does not necessarily mean that the site will not be affected by adverse changes with respect to any particular threat. Table 7 lists the categories of impact used to review site sensitivities. This is based on the list used by JNCC in Article 17 Reporting to the European Union.

Table 6 Sensitivities of European Sites to Different Types of Impact

Air pollution: Contamination	Sugarloaf Woodlands SAC
Fenn’s, Wixhall, Bettisfield, Wem and Cadney Mosses SAC	The Stiperstones and the Hollies SAC
Humber Estuary Ramsar	West Midlands Mosses SAC
Humber Flats, Marshes and Coast (Phase 2) SPA	Wye Valley and Forest of Dean Bat Sites SAC
Midlands Meres and Mosses Phase 1 Ramsar	Wye Valley Woodlands SAC
Midlands Meres and Mosses Phase 2 Ramsar	Air Quality: Eutrophication
West Midlands Mosses SAC	Brown Moss SAC
Wye Valley Woodlands SAC	Cannock Chase SAC
Air Quality: Acidification	Cannock Extension Canal SAC
Brown Moss SAC	Downton Gorge SAC
Cannock Chase SAC	Elan Valley Woodlands SAC
Cannock Extension Canal SAC	Elenydd SAC
Downton Gorge SAC	Fenn’s, Wixhall, Bettisfield, Wem and Cadney Mosses SAC
Elan Valley Woodlands SAC	Fens Pools SAC
Elenydd SAC	Humber Estuary Ramsar
Fenn’s, Wixhall, Bettisfield, Wem and Cadney Mosses SAC	Humber Flats, Marshes and Coast (Phase 2) SPA
Fens Pools SAC	Lyppard Grange Ponds SAC
Humber Estuary Ramsar	Midlands Meres and Mosses Phase 1 Ramsar
Humber Flats, Marshes and Coast (Phase 2) SPA	Midlands Meres and Mosses Phase 2 Ramsar
Lyppard Grange Ponds SAC	Motley Meadows SAC
Midlands Meres and Mosses Phase 1 Ramsar	Pasturefields Saltmarsh SAC
Midlands Meres and Mosses Phase 2 Ramsar	Peak District Dales SAC
Motley Meadows SAC	Peak District Moors (South Pennine Moors Phase 1) SPA
Pasturefields Saltmarsh SAC	Rhos Goch SAC
Peak District Dales SAC	South Pennine Moors Phase 2 SPA
Peak District Moors (South Pennine Moors Phase 1) SPA	South Pennine Moors SAC
Rhos Goch SAC	Sugarloaf Woodlands SAC
South Pennine Moors Phase 2 SPA	The Stiperstones and the Hollies SAC
South Pennine Moors SAC	West Midlands Mosses SAC

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Wye Valley Woodlands SAC	Berwyn and South Clwyd Mountains SAC
Biological Disturbance: Fish Stocking	Elan Valley Woodlands SAC
River Dee and Bala Lake SAC	Elenydd Mallaen SPA
Biological Disturbance: Barriers to movement	Elenydd SAC
Peak District Dales SAC	Peak District Dales SAC
River Clun SAC	Rhos Goch SAC
River Dee and Bala Lake SAC	Sugarloaf Woodlands SAC
River Usk SAC	Biological Disturbance: Invasive Species
Severn Estuary Ramsar	Bredon Hill SAC
Severn Estuary SAC	Brown Moss SAC
Severn Estuary SPA	Cannock Chase SAC
Biological Disturbance: Disease	Dixton Woods SAC
Ensor's Pool SAC	Downton Gorge SAC
Peak District Dales SAC	Elan Valley Woodlands SAC
River Mease SAC	Ensor's Pool SAC
River Wye SAC	Fenn's, Wixhall, Bettisfield, Wem and Cadney Mosses SAC
Severn Estuary Ramsar	Fens Pools SAC
Severn Estuary SAC	Lyppard Grange Ponds SAC
Severn Estuary SPA	Midlands Meres and Mosses Phase 1 Ramsar
Biological Disturbance: Entrainment	Midlands Meres and Mosses Phase 2 Ramsar
River Wye SAC	Peak District Dales SAC
Severn Estuary Ramsar	River Clun SAC
Severn Estuary SAC	River Dee and Bala Lake SAC
Severn Estuary SPA	River Mease SAC
Biological Disturbance: Flight Collision	River Wye SAC
Severn Estuary Ramsar	Severn Estuary Ramsar
Severn Estuary SAC	Severn Estuary SAC
Severn Estuary SPA	Severn Estuary SPA
South Pennine Moors SAC	South Pennine Moors SAC
Walmore Common Ramsar	Sugarloaf Woodlands SAC
Walmore Common SPA	West Midlands Mosses SAC
Biological Disturbance: Inappropriate grazing	Wye Valley Woodlands SAC
Berwyn and South Clwyd Mountains SAC	Biological Disturbance: Physical Damage
Brecon Beacons SAC	Berwyn and South Clwyd Mountains SAC
Elan Valley Woodlands SAC	Brecon Beacons SAC
Elenydd Mallaen SPA	Brown Moss SAC
Elenydd SAC	Cannock Chase SAC
Peak District Dales SAC	Cannock Extension Canal SAC
Sugarloaf Woodlands SAC	Elenydd SAC
Biological Disturbance: Inappropriate management	Fenn's, Wixhall, Bettisfield, Wem and Cadney Mosses SAC

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Fens Pools SAC	Cannock Chase SAC
Humber Estuary Ramsar	Dixton Woods SAC
Humber Flats, Marshes and Coast (Phase 2) SPA	Ensor's Pool SAC
Lyppard Grange Ponds SAC	Fenn's, Wixhall, Bettisfield, Wem and Cadney Mosses SAC
Midlands Meres and Mosses Phase 1 Ramsar	Llangorse Lake SAC
Midlands Meres and Mosses Phase 2 Ramsar	Lyppard Grange Ponds SAC
Mottey Meadows SAC	River Clun SAC
Pasturefields Saltmarsh SAC	River Dee and Bala Lake SAC
Peak District Dales SAC	River Mease SAC
Peak District Moors (South Pennine Moors Phase 1) SPA	River Wye SAC
River Clun SAC	Severn Estuary Ramsar
River Dee and Bala Lake SAC	Severn Estuary SAC
River Mease SAC	Severn Estuary SPA
River Wye SAC	South Pennine Moors SAC
South Pennine Moors Phase 2 SPA	The Stiperstones and the Hollies SAC
South Pennine Moors SAC	West Midlands Mosses SAC
The Stiperstones and the Hollies SAC	Wye Valley and Forest of Dean Bat Sites SAC
Wye Valley Woodlands SAC	Wye Valley Woodlands SAC
Biological Disturbance: Physical Disturbance	Land Use Change: Loss of Supporting Habitat
Berwyn and South Clwyd Mountains SAC	Cannock Chase SAC
Brecon Beacons SAC	Peak District Moors (South Pennine Moors Phase 1) SPA
Cannock Chase SAC	Rhos Goch SAC
Elan Valley Woodlands SAC	River Usk SAC
Elenydd Mallaen SPA	South Pennine Moors Phase 2 SPA
Elenydd SAC	Wye Valley and Forest of Dean Bat Sites SAC
Fens Pools SAC	Water Levels: Increases
Llangorse Lake SAC	Fenn's, Wixhall, Bettisfield, Wem and Cadney Mosses SAC
Peak District Moors (South Pennine Moors Phase 1) SPA	Mottey Meadows SAC
River Mease SAC	Pasturefields Saltmarsh SAC
River Wye SAC	Walmore Common Ramsar
Severn Estuary Ramsar	Walmore Common SPA
Severn Estuary SAC	West Midlands Mosses SAC
Severn Estuary SPA	Wye Valley and Forest of Dean Bat Sites SAC
South Pennine Moors Phase 2 SPA	Water Levels: Reductions
Walmore Common Ramsar	Berwyn and South Clwyd Mountains SAC
Walmore Common SPA	Brown Moss SAC
Wye Valley and Forest of Dean Bat Sites SAC	Cannock Chase SAC
Wye Valley Woodlands SAC	Ensor's Pool SAC
Biological Disturbance: Physical Loss	Fenn's, Wixhall, Bettisfield, Wem and Cadney Mosses SAC
Bredon Hill SAC	Fens Pools SAC

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Midlands Meres and Mosses Phase 1 Ramsar	Midlands Meres and Mosses Phase 2 Ramsar
Midlands Meres and Mosses Phase 2 Ramsar	Mottey Meadows SAC
Pasturefields Saltmarsh SAC	Pasturefields Saltmarsh SAC
Peak District Dales SAC	Peak District Dales SAC
Rhos Goch SAC	Rhos Goch SAC
West Midlands Mosses SAC	River Clun SAC
Water Quality: Acidification	River Dee and Bala Lake SAC
Midlands Meres and Mosses Phase 1 Ramsar	River Mease SAC
River Wye SAC	River Usk SAC
West Midlands Mosses SAC	River Wye SAC
Water Quality: Biological oxygen demand	Severn Estuary Ramsar
River Clun SAC	Severn Estuary SAC
Water Quality: Change in salinity	Severn Estuary SPA
Severn Estuary Ramsar	South Pennine Moors SAC
Severn Estuary SAC	Walmore Common Ramsar
Severn Estuary SPA	Walmore Common SPA
Water Quality: Contamination	West Midlands Mosses SAC
Ensor's Pool SAC	Wye Valley and Forest of Dean Bat Sites SAC
Fenn's, Wixhall, Bettisfield, Wem and Cadney Mosses SAC	Wye Valley Woodlands SAC
Fens Pools SAC	Water Quality: Siltation
Humber Estuary Ramsar	Brown Moss SAC
Humber Flats, Marshes and Coast (Phase 2) SPA	Fenn's, Wixhall, Bettisfield, Wem and Cadney Mosses SAC
Lyppard Grange Ponds SAC	Midlands Meres and Mosses Phase 1 Ramsar
Peak District Dales SAC	Midlands Meres and Mosses Phase 2 Ramsar
River Clun SAC	Pasturefields Saltmarsh SAC
River Mease SAC	Peak District Dales SAC
River Wye SAC	River Clun SAC
Severn Estuary Ramsar	River Dee and Bala Lake SAC
Severn Estuary SAC	River Mease SAC
Severn Estuary SPA	River Wye SAC
Wye Valley and Forest of Dean Bat Sites SAC	Severn Estuary Ramsar
Water Quality: Eutrophication	Severn Estuary SAC
Brown Moss SAC	Severn Estuary SPA
Cannock Chase SAC	West Midlands Mosses SAC
Cannock Extension Canal SAC	Water Quality: Turbidity
Fenn's, Wixhall, Bettisfield, Wem and Cadney Mosses SAC	Ensor's Pool SAC
Humber Estuary Ramsar	Fens Pools SAC
Humber Flats, Marshes and Coast (Phase 2) SPA	Lyppard Grange Ponds SAC
Llangorse Lake SAC	Severn Estuary Ramsar
Midlands Meres and Mosses Phase 1 Ramsar	Severn Estuary SAC

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Severn Estuary SPA

Water Quality: Water temperature

River Wye SAC

Severn Estuary Ramsar

Severn Estuary SAC

Severn Estuary SPA

Water Supply: Freshwater flow reduction

Cannock Extension Canal SAC

Humber Estuary Ramsar

Humber Flats, Marshes and Coast (Phase 2) SPA

Lyppard Grange Ponds SAC

Midlands Meres and Mosses Phase 2 Ramsar

River Clun SAC

River Dee and Bala Lake SAC

River Mease SAC

River Usk SAC

River Wye SAC

Severn Estuary Ramsar

Severn Estuary SAC

Severn Estuary SPA

South Pennine Moors SAC

Walmore Common Ramsar

Walmore Common SPA

Wye Valley and Forest of Dean Bat Sites SAC

Wye Valley Woodlands SAC

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The list below draws on European Union guidance on reporting under the Habitats Directive and reflects the list used by JNCC in Article 17 Reporting. The extent to which policy recommendations might give rise to these types of impact has been considered.

Whether impacts are positive or negative may be context specific. For example tree planting may be considered positive in most locations but negative on open valued wildlife habitats. However most of the impacts identified below are adverse in most situations. Not all possible positive impacts are included on the list, so we have added some new codes so that positive impacts can also be considered. Some of the new codes represent positive impacts which might play a part in providing mitigation for one of the other (adverse) impacts in the list. These are given a code with a 5 preceding it (e.g. 301 Quarries becomes 5301 Quarry restoration).

Table 7 Impact types and codes used in JNCC Article 17 reporting

Impact Code	Impact Name
100	Cultivation
110	Use of pesticides
120	Fertilisation
130	Irrigation
140	Grazing
160	Forestry management
161	Forest planting
163	Forest replanting
164	Forestry clearance
210	Professional fishing
220	Leisure fishing
300	Sand and gravel extraction
301	Quarries
310	Peat extraction
320	Exploration and extraction of oil or gas
331	Open cast mining
332	Underground mining
340	Salt works
400	Urbanised areas, human habitation
410	Industrial or commercial areas
411	Factory
412	Industrial stockage
420	Discharges
421	Disposal of household waste
422	Disposal of industrial waste
423	Disposal of inert materials
440	Storage of materials
500	Communication networks
501	Paths, tracks, cycling tracks
502	Roads, motorways
503	Railway lines, TGV
505	Airport
507	Bridge, viaduct
508	Tunnel
510	Energy transport
511	Electricity lines
512	Pipe lines
530	Improved access to site
600	Sport and leisure structures
601	Golf course
603	Stadium
604	Circuit, track
606	Attraction park
607	Sports pitch
608	Camping and caravans
620	Outdoor sports and leisure activities
622	Walking, horse riding and non-motorised vehicles
623	Motorised vehicles
624	Mountaineering, rock climbing, speleology

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625	Gliding, delta plane, paragliding, ballooning
701	Water pollution
702	Air pollution
703	Soil pollution
709	Other forms or mixed forms of pollution
710	Noise nuisance
720	Trampling, overuse
730	Military manoeuvres
740	Vandalism
800	Landfill, land reclamation and drying out, general
803	Infilling of ditches, dykes, ponds, pools, marshes or pits
810	Drainage
811	Management of aquatic and bank vegetation for drainage purposes
830	Canalisation
840	Flooding
850	Modification of hydrographic functioning, general
852	Modifying structures of inland water courses
853	Management of water levels
900	Erosion
910	Silting up
920	Drying out
948	Fire (natural)
5100	Habitat restoration on cultivated land
5120	Soil nutrient reduction
5140	Protection from grazing
5300	Sand and gravel pit restoration
5301	Quarry restoration
5310	Restoration of peat extraction site
5331	Restoration of open cast mine
5400	Greening of urbanised areas
5421	Re-use or recycling of household waste
5422	Re-use or recycling of industrial waste
5502	Habitat restoration along roads, motorways
5530	Controls on site public access
5601	Habitat restoration on golf course
5701	Water pollution mitigation
5702	Air pollution mitigation

5710	Noise mitigation
5720	Restoration of trampling, overused areas
5730	Restoration of military impacts
5830	Restoration of natural water courses
5840	Flood alleviation
5852	Barrier removal on water courses
5900	Erosion control or restoration
5948	Fire mitigation measures
6100	Tree planting
6101	Wetland creation
6102	Building restoration
6103	Carbon sequestration
6104	Greenhouse gas emissions reduction

9 Appendix 2: Summary of impacts on European sites

Phase 3 Policy Recommendations and their potential impacts on European sites		
Summary of Policy Recommendations	Potential impacts and sites affected	Recommendations and issues to address in further policy development
Rural Services		
Increasing emphasis on community-based solutions	<p>Main implications for European sites associated with changes in transport patterns. Beneficial effects possible depending on extent to which public transport substitutes for travel by car.</p> <p>Sites that could be affected if transport-related air emissions increased are:</p> <p>Berwyn and South Clwyd SAC, Elenydd Mallaen SAC/SPA, Brecon Beacons SAC, Elan Valley Woodlands SAC, Bredon Hill SAC, Cannock Chase SAC, Dixton Wood SAC, Downton Gorge SAC, Fenns, Wixhall, Bettisfield, Wem and Cadney Mosses SAC, Peak District Dales SAC, South Pennine Moors SAC, the Stiperstones and the Holley SAC, West Midlands Mosses SC, Wye Valley Woodlands SAC, Peak District Moors SPA and South Pennine Moors Phase II SPA.</p>	<p>More information required about likely changes in transport volume/patterns associated with more detailed policy recommendations in future in order to predict implications for local and diffuse air pollution, particularly for those sites highlighted in bold, which could be affected by traffic increases on major roads. In particular a stronger monitoring base is required with respect to actual levels of deposition at sensitive sites</p>
Culture and Sport		
Recognises the role of Culture and Sport as an important tool in delivering sustainable communities and 'living places' to achieve urban and rural renaissance. Aims to change the region's 'Lack of Culture of Culture' and to increase	<p>Difficult to identify specific risks and it is not clear whether proposed new venues or assets are in locations where development might affect European sites.</p>	<p>Specific proposals might need to be appraised in future.</p>

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

Phase 3 Policy Recommendations and their potential impacts on European sites		
Summary of Policy Recommendations	Potential impacts and sites affected	Recommendations and issues to address in further policy development
participation and engagement in culture and sport.		
Tourism and the Visitor Economy		
Tourism is a key sector of the region's economy. Policy recommendations focus on promotion of tourism, with some attention to sustainable development tourism opportunity. Principles are set out for further development of policy.	<p>Several European sites could be affected by promotion of tourism. Many European sites are tourism assets in themselves and some are already exposed to adverse effects from physical damage, disturbance and air pollution associated with road traffic.</p> <p>Sites affected include Cannock Extension Canal SAC, Cannock Chase SAC, South Pennine Moors SAC, Peak District Dales SAC, River Clun, River Wye SAC, Wye Valley Woodlands, River Dee and Bala Lake SAC, Peak District Moors SPA and South Pennine Moors Phase II SPA.</p> <p>Specific reference is made to promotion of the "the countryside, canal network and market towns/cathedral cities as hubs of activity". This has implications for the Cannock Extension Canal SAC and possibly for Montgomery Canal SAC in Wales.</p>	<p>A stronger emphasis on transport provision is required to ensure that there are no further increases in traffic on roads through some sites, notably Cannock Chase SAC, Peak District Dales SAC, South Pennine Moors SAC and Peak District Moors SPA.</p> <p>While the policy recommendations do refer to the need to seek sustainable transport solutions "where possible", there may be some cases where promotion of tourism might be contingent on such provision being made, to avoid adverse impacts on the integrity of European sites.</p> <p>Further dialogue is required with site managers to discuss implications of tourism policies for European sites, before firm proposals are drawn up.</p>
Integrated Approach to the Management of Environmental Resources		
Over-arching policy should help to embed environmental requirements in subsequent stages of planning. This will have positive effects.	Most European Sites potentially affected but effects largely beneficial provided that there is a stronger emphasis on enhancement and delivery.	
Associated Quality of the Environment Policies		
Restoring Degraded Areas & Managing & Creating High Quality New Environments	Implications generally positive and dealt with through Phase 2HRA recommendations	Implications generally positive and dealt with through Phase 2HRA recommendations
Green Infrastructure	Likely beneficial effects but mechanisms needed to	Need to consider role of green infrastructure with regard to biodiversity and landscapes resilient to effects of climate change and

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

Phase 3 Policy Recommendations and their potential impacts on European sites		
Summary of Policy Recommendations	Potential impacts and sites affected	Recommendations and issues to address in further policy development
	ensure delivery “on the ground”	to consolidate and buffer European sites such as Cannock Chase SAC and the Wye Valley Woodlands and Wye Valley and Forest of Dean Bat Sites SACs.
Protection & Enhancement of Historic Environment	No issues identified	No issues identified
Conservation, Enhancement and Restoration of the Region’s landscape	Scope for ensuring that landscape, biodiversity and European Site interests are addressed in an integrated way.	Beneficial effects possible if management of landscape delivers ecological networks that support biodiversity in European Sites.
Protecting, Managing and Enhancing the Region’s Biodiversity and Geodiversity	Likely beneficial effects	Beneficial effects for all sites in the Region if biodiversity is protected and enhanced and Regional targets are delivered.
Trees, Woods and Forestry	Likely beneficial effects	Likely beneficial effects but siting of woodlands should take account of implications for European sites and associated species (e.g. and not remove supporting habitat to replace it with woodland)
Protection of Agricultural Land	No issues identified	No issues identified
Air quality	New text expected to be beneficial, reflecting findings of HRA of Phase 2 and other assessments.	<p>The HRA of the Phase Two Revision (TEC, 2007) concluded that the integrity of a number of European sites was at risk from any additional air pollution associated with proposals set out in the RSS Phase II, as they were already over their critical loads for certain atmospheric pollutants (see Appendix A). Sites that could be affected if transport-related air emissions increased are:</p> <p>Berwyn and South Clwyd SAC, Elenydd Mallaen SAC/SPA, Brecon Beacons SAC, Elan Valley Woodlands SAC, Bredon Hill SAC, Cannock Chase SAC, Dixton Wood SAC, Downton Gorge SAC, Fenns, Wixhall, Bettisfield, Wem and Cadney Mosses SAC, Peak District Dales SAC, South Pennine Moors SAC, the Stiperstones and the Holley SAC, West Midlands Mosses SC, Wye Valley Woodlands SAC, Peak District Moors SPA and South Pennine Moors Phase II SPA.</p> <p>Sites highlighted in bold are those near to major transport routes. Policy SR4 was added to the Phase Two Revision to mitigate for this.</p>

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

Phase 3 Policy Recommendations and their potential impacts on European sites		
Summary of Policy Recommendations	Potential impacts and sites affected	Recommendations and issues to address in further policy development
		However, the re-examination of Paragraphs 8.45 and 8.46 of the existing WMRSS through Phase Three provides an opportunity to examine any new information relating to the levels of deposition at European sites and any new plans and projects that might influence air quality in the future. There is currently a great deal of uncertainty concerning actual impacts on designated interest features. Traffic modelling and monitoring of air quality are not currently set up to deal effectively with issues affecting European sites. A stronger evidence base will be needed to refine future HRA and strengthen the ability to assess the significance of changes in levels of emission.
Energy Efficiency	Policy promoting energy efficiency will be largely beneficial, particularly with respect to levels of air pollution and climate change.	No further issues
Renewable Energy - Targets	No issues identified	No further issues
Renewable Energy – Criteria for Ensuring that Renewable Energy is Appropriate Located	Possible land take, disturbance and mortality related to development of energy infrastructure.	Technology specific and location-specific policies will help confirm likely impacts and how to avoid hold ups lower down in the planning system. It may be necessary to take a constraints-based approach, developing criteria for avoidance of impacts on European Sites through appropriate siting and design and by ensuring sufficient regional baseline information is available, particularly for protected species when outside of European Sites.
Positive Uses of Green Belt	With reference to European sites, it is possible that efforts to conserve biodiversity or create green infrastructure within the Green Belt could benefit those sites located in or near it. On the other hand developments that would result in land take or increased levels of access or disturbance could have adverse effects.	Opportunity to help buffer European sites by providing supporting habitat and other environmental services important for the integrity of European Sites. Sites in or near greenbelt include Cannock Chase SAC, Cannock Extension Canal SAC, Ensor's Pool SAC, Fens Pool SAC, Motte Meadows SAC.

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

Phase 3 Policy Recommendations and their potential impacts on European sites		
Summary of Policy Recommendations	Potential impacts and sites affected	Recommendations and issues to address in further policy development
Safeguarding Minerals Resources in the West Midlands including Future Brick Clay Provision		
Safeguarding Mineral Resources in the West Midlands: development of policies on safeguarding mineral resources and the future supplies of construction aggregates and brick clay.	<p>Safeguarding does not necessarily give rise to impacts. These only occur if sites are worked (see below). HRA has focused on appraising the extent to which safeguarded resources represent a potential risk in cases where existing sites would be expanded. Other impacts are dependent on the sub-regional apportionment which is assessed in a separate study. They include impacts such as land take, disturbance, change in water levels and water pollution arising from future workings. Possible transport-related impacts also. These would have to be assessed in more detail at other planning stages.</p> <p>Sites which could be affected by extension of existing workings include:</p> <p>Peak District Dales, River Mease SAC, River Wye SAC, Midlands Meres and Mosses Phases I and II Ramsar.</p>	Refer to HRA of sub-regional apportionment
Communities for the Future – Sites for Gypsies, Travellers and Travelling Showpeople (Regional Policy Statement)		
Increased numbers of residential and temporary pitches and sites for travelling showpeople	<p>Local air pollution impacts, physical damage and disturbance, pollution of soil/water.</p> <p>Some of the new sites allocated could affect Cannock Chase SAC.</p>	Sensitive locations near European Sites should be avoided. Any such sites within 8km of the boundary of Cannock Chase SAC will need detailed consideration as site is already damaged by local air pollution and physical damage. There are also constraints on water supply. For other sites an indicative distance of 10km is suggested which would trigger the need for more detailed assessment. This could also be used as a constraint on location of potential sites.

10 Appendix 3: European Sites Vulnerable to Increased Air Pollution/ Deposition Levels

The original Phase Two HRA assessment (completed in October 2007) used the best information that was available at the time through the Air Pollution Information System and available through the Electricity Supply Industry Habitats Spreadsheet¹ to understand the areas at risk from the adverse effects of acidification and eutrophication. APIS has since been updated with the addition of Site Relevant Critical Loads and a Source Apportionment for the UK Natura 2000 network².

This updated “detailed site based assessment” tool enables an assessment against a “critical load function” (CLF) as opposed to a “critical load value” and the deposition data for nitrogen and sulphur at each specific site is provided. The user is able to select a specific European site, and identify the critical load function for acidification for this site where applicable, together with a range of critical loads for nutrient nitrogen deposition.

Because of the site-specific nature of these values, they provide a more accurate reflection of the sensitivity of individual sites to acid and nutrient nitrogen deposition than the previous Simple Site-Based Assessment data. The higher level of detail enables an assessment against a critical load function for acid deposition to be carried out, rather than being limited to a critical load value. This function was available through the Electricity Supply Industry Habitats Spreadsheet and the values presented in Table 7 of the Phase Two HRA were checked against these to confirm whether or not a site’s critical load was exceeded. Nonetheless, it is prudent to check that the APIS models provides the same results for each site at least in terms of whether or not the site exceeds the lower bounds of the critical loads for acidity and nutrient nitrogen.

The table below examines the sensitive sites identified in the RSS Phase 2 HRA using the detailed site-based assessment methodology.

¹ Impact of atmospheric emissions from JEP coal and oil-fired power stations on sites protected by the Habitats Directive. Diane Brooke, Steve Griffiths, Keith Sadler and Rob Lennard. Joint Environment Programme report ENV/054/2005, PT/06/BE130/R. Issued February 2006.

² Addition of Site Relevant Critical Loads and Source Apportionment for UK Natura 2000 network in 20th October 2007. http://www.apis.ac.uk/cgi_bin/updates.pl

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Table 8 – information on Critical Loads (CL) for acidity and nutrient nitrogen at different European sites

European site	Interest Feature	Does site exceed the lower bounds of CL for acidity – 2003	Does site exceed minimum CL for Nutrient Nitrogen - 2003	Does site exceed the lower bounds of CL for acidity – 2010	Does site exceed minimum CL for Nutrient Nitrogen - 2010
Berwyn & South Clwyd SAC	European dry heaths (H4030)	Yes	Yes – exceeds upper bound levels	Yes	Yes – but below upper bound levels
	Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (H6210)	No	Yes	No	Yes
	Blanket bogs (H7130)	Yes – exceeds the upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels
	Transition mires and quaking bogs (H7140)	Yes – exceeds the upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes - but below upper bound levels
	Calcareous and calcshist screes of the montane to alpine levels (<i>Thlaspietea rotundifolii</i>) (H8120)	No – Feature not sensitivity to acidification	Sensitive to Nutrient Nitrogen and total deposition currently exceeds upper bound levels	No – Feature not sensitivity to acidification	Sensitive to Nutrient Nitrogen and total deposition currently exceeds upper bound levels
	Calcareous rocky slopes with chasmophytic vegetation (H8210)	Yes	Yes – exceeds upper bound levels	Yes	Yes – exceeds upper bound levels
Brecon Beacons SAC	European dry heaths (H4030)	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes	Yes
	Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels (H6430)	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels
	Calcareous rocky slopes with	Yes – exceeds upper	Yes – exceeds upper	Yes – exceeds upper	Yes – exceeds upper

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European site	Interest Feature	Does site exceed the lower bounds of CL for acidity – 2003	Does site exceed minimum CL for Nutrient Nitrogen - 2003	Does site exceed the lower bounds of CL for acidity – 2010	Does site exceed minimum CL for Nutrient Nitrogen - 2010
	chasmophytic vegetation (H8210)	bound levels	bound levels	bound levels	bound levels
	Siliceous rocky slopes with chasmophytic vegetation (H8220)	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels
Bredon Hill SAC	<i>Limoniscus violaceus</i> (S1079) (Violet click beetle)	No – in addition there is no expected negative impact on the species due to impacts on the species’ broad habitat.	Broad habitat sensitive to Nutrient Nitrogen but there is no expected negative impact on species due to impacts on the species’ broad habitat.	No – in addition there is no expected negative impact on the species due to impacts on the species’ broad habitat.	Broad habitat sensitive to Nutrient Nitrogen but there is no expected negative impact on species due to impacts on the species’ broad habitat.
Cannock Chase SAC	Northern Atlantic wet heaths with <i>Erica tetralix</i> (H4010)	Yes	Yes	Yes	Yes
	European dry heaths (H4030)	Yes	Yes	Yes	Yes
Dixton Wood SAC	<i>Limoniscus violaceus</i> (S1079) (Violet click beetle)	No – in addition there is no expected negative impact on the species due to impacts on the species’ broad habitat.	Broad habitat sensitive to Nutrient Nitrogen but there is no expected negative impact on constituent species due to impacts on the species’ broad habitat.	No – in addition there is no expected negative impact on constituent species due to impacts on the species’ broad habitat.	Broad habitat sensitive to Nutrient Nitrogen but there is no expected negative impact on constituent species due to impacts on the species’ broad habitat.

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European site	Interest Feature	Does site exceed the lower bounds of CL for acidity – 2003	Does site exceed minimum CL for Nutrient Nitrogen - 2003	Does site exceed the lower bounds of CL for acidity – 2010	Does site exceed minimum CL for Nutrient Nitrogen - 2010
Downton Gorge SAC	Tilio-Acerion forests of slopes, screes and ravines (H9180)	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – but below upper bound levels	Yes – exceeds upper bound levels
Elan Valley Woodlands SAC	Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles (H91A0)	Yes	Yes – exceeds upper bound levels	Yes	Yes – exceeds upper bound levels
	Tilio-Acerion forests of slopes, screes and ravines (H9180)	Yes	Yes – exceeds upper bound levels	Yes	Yes – exceeds upper bound levels
	European dry heaths (H4030)	Yes	Yes	Yes	Yes
Elenydd SAC	Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or of the Iso?to-Nanojuncetea (H3130)	Info not available – feature is sensitive to acidity	Yes – exceeds upper bound levels	Info not available – feature is sensitive to acidity	Yes – exceeds upper bound levels
	European dry heaths (H4030)	Yes	Yes	Yes	Yes
	Calaminarian grasslands of the <i>Violetalia calaminariae</i> (H6130)	No	Yes	No	No
	Blanket bogs (H7130)	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels
	<i>Luronium natans</i> (S1831)	Info not available – feature is sensitive to	Yes – exceeds upper bound levels	Info not available – feature is sensitive to	Yes – exceeds upper bound levels

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European site	Interest Feature	Does site exceed the lower bounds of CL for acidity – 2003	Does site exceed minimum CL for Nutrient Nitrogen - 2003	Does site exceed the lower bounds of CL for acidity – 2010	Does site exceed minimum CL for Nutrient Nitrogen - 2010
		acidity		acidity	
Fenns, Wixhall, Bettisfield, Wem and Cadney Mosses SAC	Active raised bogs (H7110)	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels
	Degraded raised bogs still capable of natural regeneration (H7120)	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels
Peak District Dales SAC	European dry heaths (H4030)	Yes	Yes – exceeds upper bound levels	Yes	Yes – exceeds upper bound levels
	Calaminarian grasslands of the <i>Violetalia calaminariae</i> (H6130)	No	Yes – exceeds upper bound levels	No	Yes - but below upper bound levels
	Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (H6210)	No	Yes – exceeds upper bound levels	No	Yes - but below upper bound levels
	Alkaline fens (H7230)	No	Yes	No	Yes
	Calcareous and calcshist screes of the montane to alpine levels (<i>Thlaspietea rotundifolii</i>) (H8120)	No	Yes – exceeds upper bound levels	No	Yes – exceeds upper bound levels
	Calcareous rocky slopes with chasmophytic vegetation (H8210)	Yes	Yes – exceeds upper bound levels	Yes	Yes – exceeds upper bound levels
	Tilio-Acerion forests of slopes,	Yes	Yes – exceeds upper	Yes	Yes – exceeds upper

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European site	Interest Feature	Does site exceed the lower bounds of CL for acidity – 2003	Does site exceed minimum CL for Nutrient Nitrogen - 2003	Does site exceed the lower bounds of CL for acidity – 2010	Does site exceed minimum CL for Nutrient Nitrogen - 2010
	screes and ravines (H9180)		bound levels		bound levels
	<i>Austropotamobius pallipes</i> (S1092). White-clawed (or Atlantic stream) crayfish <i>Lampetra planeri</i> (S1096) (Brook lamprey) <i>Cottus gobio</i> (S1163)	There is insufficient knowledge to make a judgement about the impacts on this species. Decision should be made at a site specific level. Further research is required to assess sensitivity to acidification of this species. Nutrient nitrogen - Decision to be taken at a site specific level since habitat sensitivity depends on N or P limitation.			
	Northern Atlantic wet heaths with <i>Erica tetralix</i> (H4010)	Yes	Yes	Yes	Yes
	European dry heaths (H4030)	Yes	Yes – exceeds upper bound levels	Yes	Yes – exceeds upper bound levels
South Pennine Moors SAC	Blanket bogs (H7130)	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels
	Transition mires and quaking bogs (H7140)	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels
	Old sessile oak woods with Ilex and Blechnum in the British Isles (H91A0)	Yes	Yes – exceeds upper bound levels	Yes	Yes – exceeds upper bound levels
The Stiperstones	European dry heaths (H4030)	Yes	Yes	Yes	Yes

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European site	Interest Feature	Does site exceed the lower bounds of CL for acidity – 2003	Does site exceed minimum CL for Nutrient Nitrogen - 2003	Does site exceed the lower bounds of CL for acidity – 2010	Does site exceed minimum CL for Nutrient Nitrogen - 2010
and the Holley SAC	Old sessile oak woods with Ilex and Blechnum in the British Isles (H91A0)	Yes – exceeds upper bound levels	Yes – exceeds upper bound levels	Yes - but below upper bound levels	Yes – exceeds upper bound levels
West Midlands Mosses SAC	Natural dystrophic lakes and ponds (H3160)	No	Yes – exceeds upper bound levels	No	Yes – exceeds upper bound levels
	Acid peat-stained lakes and ponds				
	Transition mires and quaking bogs (H7140)	Yes – exceeds upper bound levels	Yes	Yes – exceeds upper bound levels	Yes
Wye valley woodlands SAC	<i>Asperulo-Fagetum</i> beech forests (H9130)	Yes	Yes – exceeds upper bound levels	Yes	Yes – exceeds upper bound levels
	<i>Tilio-Acerion</i> forests of slopes, screes and ravines (H9180)	Yes	Yes – exceeds upper bound levels	Yes	Yes – exceeds upper bound levels
	<i>Taxus baccata</i> woods of the British Isles (H91J0)	Yes	Yes – exceeds upper bound levels	Yes	Yes – exceeds upper bound levels
	<i>Rhinolophus hipposideros</i> (S1303)	There is insufficient knowledge to make a judgment of the impacts on this species. Decision should be made at a site specific level.			
Elenydd - Mallaen SPA	<i>Falco columbarius</i> & <i>Milvus milvus</i>	No expected negative impact on these species due to impacts on the species' broad habitat.			

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European site	Interest Feature	Does site exceed the lower bounds of CL for acidity – 2003	Does site exceed minimum CL for Nutrient Nitrogen - 2003	Does site exceed the lower bounds of CL for acidity – 2010	Does site exceed minimum CL for Nutrient Nitrogen - 2010
Peak District Moors SPA & South Pennine Moors Phase II SPA		<p>A number of species are considered sensitive to Nutrient Nitrogen.</p> <p>Potential negative impact on species due to impacts on the species' broad habitat (Transition of breeding habitat (moorland, unmanaged heather moor, bogs and hill pasture) to grass).</p> <p>However, potential positive impact due to increased food supply caused by eutrophication.</p>			

Key:

Total deposition falls below the lower curve of CLF – unlikely to be a problem
Total deposition falls between estimates of CLF – may be a problem – more detailed site specific assessment needed
Total deposition falls above the upper estimates of CLF – very likely to be a problem

11 Appendix 4 Summaries of policy recommendations and sites affected

11.1 Rural Services

Objectives of policy	<p>To identify:</p> <ul style="list-style-type: none"> • the role, if any, that service provision plays in enhancing the sustainability of rural communities; • whether particular services are critical to enhancing the sustainability of rural communities, and if this is the case; • prioritise those services, particularly those which meet the needs of disadvantaged groups, in different types of rural areas, and; • whether different policy responses are required in remote and accessible rural locations.
Recommended Policy Approach	<p>To provide a strategic framework which is:</p> <ul style="list-style-type: none"> • Not prescriptive about which services are “critical” or key; • Provides a framework for locally based analysis centred on “community of place”; • Recognises that “sustainability” is multi-layered and that low carbon solutions may apply equally to some rural based services; • Ties in Rural Renaissance policies with Communities for the Future policies showing clear links; • Requires Local planning Authorities in their plan making and development management process to take into account legitimate local service needs of rural communities and what contribution can be made towards delivering more sustainable places based on local intelligence; • Requires Local Planning and Transport Authorities to demonstrate how their LDF’s and LTP’s have used tested and/or innovative approaches to locally led reviews to assess rural service provision at a scale appropriate to the locality and to demonstrate how this delivers the Regional Strategy, and local Spatial Strategies addressing rural settlements;

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	<ul style="list-style-type: none"> • Is clear about the approach to be adopted as to how local development may usefully contribute to local regeneration and needs, i.e. locally identified (bottom up community led) service, facility and infrastructure needs including affordable housing; • Able to demonstrate through their Local Implementation Plan or Single Conversation Investment Plan how this evidence is to be used to guide delivery matched to that need; • Clear how local community plans such as Parish Plans have been taken into consideration in establishing a coherent strategy for rural renaissance; • Able to demonstrate how the resilience of cross-border communities has been supported.
European Sites affected	<p>All sites in rural contexts could be affected. Likely to include at least:</p> <p>Berwyn & South Clwyd SAC, Elenydd Mallaen SAC/SPA, Brecon Beacons SAC and Elan Valley Woodlands SAC Bredon Hill SAC, Cannock Chase SAC, Dixon Wood SAC, Downton Gorge SAC, Fenns, Wixhall, Bettisfield, Wem and Cadney Mosses SAC, Peak District Dales SAC, South Pennine Moors SAC, The Stiperstones and the Holley SAC, West Midlands Mosses SAC, Wye valley Woodlands SAC, Peak District Moors SPA, South Pennine Moors Phase II SPA</p>
Implications for European sites	<p>The policy recommendations are not spatially explicit, so it is difficult to identify the areas likely to be affected. Impacts on European sites will largely be associated with housing provision and transport. There are several sites in the West Midlands, in neighbouring regions and in Wales which are already adversely affected by air pollution.</p>

11.2 Culture, sport and tourism

Culture and Sport	
Policy objectives	<ul style="list-style-type: none"> To ensure Culture and Sport is embedded in the RS so it can effectively address the region's poor level of participation (below the national average) and associated factors such as poor health. To ensure the role of Culture and Sport is recognised as an important tool in delivering sustainable communities and 'living places' to achieve urban and rural renaissance.
Recommended approach	Several recommendations relating to promotion of opportunities to participate in culture and sport. None of these are specific in spatial terms.
Sites affected	All sites in the region could be affected.
Main implications for the integrity of sites	There will be site-specific impacts that need to be considered when more detailed recommendations are developed.
Mitigation recommended	Increased emphasis on development of alternative transport options.
Residual issues	<p>In districts with European sites which are considered to be sensitive to visitor pressure and will receive additional homes, more detailed assessment may be necessary. This level of assessment has not been possible at this stage due to the indicative nature of the policy recommendations.</p> <p>In particular, further consultation with managers/owners of the sites identified in this table may be required to discuss trends in visitor numbers and to understand the distances people are likely to travel to visit certain sites</p>
Tourism	
Policy objectives	To strengthen regional policy to meet the strategic, sporting and tourism needs of the Region and to support sustainable economic growth and regeneration.
Recommended approach	The Policy Recommendation seeks to ensure that emerging policy reflects the nature and key characteristics of

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approach	tourism and the visitor economy, identifies key synergies and opportunities, and sets a framework which promotes economic growth in the sector, while contributing to sustainable development and climate change objectives.
Sites affected	<p>Many European sites in the region, in neighbouring regions of England and in Wales are important tourist destinations. In particular:</p> <ul style="list-style-type: none"> • Berwyn and South Clwyd Mountains SAC/SPA • Cannock Chase SAC; • Cannock Chase Extension Canal SAC • Montgomery Canal SAC • Peak District Dales SAC; • South Pennine Moors SAC; • Peak District Moors (South Pennine Moors Phase I) SPA; • South Pennine Moors Phase II SPA • River Dee and Bala Lake SAC • River Wye SAC • The Stiperstones and the Holley SAC <p>Specific references are made to the River Wye (River Wye SAC); the region’s canal network (includes the Cannock Extension Canal SAC and the Montgomery Canal SAC) and also the Peak District and the Pennines (Peak District Dales SAC, Peak District Moors (South Pennine Moors Phase I) SPA; South Pennine Moors Phase II SPA; South Pennine Moors SAC).</p>
Main implications for the integrity of sites	There will be site-specific impacts that need to be considered when more detailed recommendations are developed. Many potential impacts relate to air pollution (both diffuse and associated with increased transport on roads near sites); physical damage and disturbance.
Mitigation recommended	Increased emphasis on development of alternative transport options and on partnership working to develop solutions

	for trans-boundary sites.
Residual issues to address	TBC

11.3 Integrated approach to the management of environmental resources

Policy objectives	<p>To develop a strategy for the protection, conservation, enhancement and management of regional environmental assets and resources, for their intrinsic value and wider social and economic benefits.</p> <p>This policy recommendation provides for the updating of Policy QE1: Conserving and Enhancing the Environment from the existing RSS Quality of the Environment chapter on environment policies.</p>
Recommended policy approach	<p>The new overarching environmental policy should articulate:</p> <ul style="list-style-type: none"> a) A vision or reference to a vision for the region’s environment for positive enhancement and environmental gain, drawing on the ecosystems approach, quality of place and other initiatives, developing the environmental elements from the Sustainable Region policies and setting the context for more specific environmental policies, where relevant; b) A regional dimension to key global/international goals/themes, such as climate change mitigation and adaptation, loss of biodiversity and the integrity of European sites, enhancement of degraded or damaged areas and environmental justice. Emphasis will be required on the intrinsic importance of environmental assets and the services that the environment provides, such as flood prevention/alleviation and local climate regulation; c) The contribution that the environment can make towards the creation of sustainable communities, including opportunities to enhance place making, health and well-being, and local distinctiveness, in the context of the growth and regeneration agenda; d) The importance of protecting and enhancing the quality of the environment for urban and rural renaissance, for the image and attractiveness of the region as a place to live, work and invest, and to deliver a low carbon economy; e) Key integrating themes which will be promoted to ensure multi-functional benefits, and within

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	<p>which more detailed environmental policy can be provided;</p> <ul style="list-style-type: none"> • To conserve and enhance the historic environment and deliver quality in the built environment; • To protect and enhance green infrastructure and establish and promote a landscape scale approach; and • To conserve and enhance natural resources and minimise the consumption of resources; <p>f) The key delivery mechanisms for environmental enhancement.</p>
Sites affected	All European sites in the region and to some extent, sites in neighbouring regions of England and in Wales.
Main implications for the integrity of sites	<p>This area of policy could have considerable benefits for European sites in general through a range of policy measures relating to <i>inter alia</i> land use, biodiversity, water resources and climate change.</p> <p>European Sites would benefit, for example, from a greater emphasis on enhancement, particularly through efforts to enhance biodiversity in the wider landscape and to create climate resilient habitat networks in the region.</p>
Mitigation recommended	<p>This policy should make specific reference to the threats and pressures affecting European sites in the region and the need to ensure that these are managed effectively, in order to maintain the integrity of these sites and ensure that they can continue as a fundamental component of the region's environmental assets. The policy should also set out more clearly the measures that need to be taken in order to ensure that European sites in the region, and the habitats and species they support, are able to withstand the effects of climate change.</p>
Residual issues to address	<p>Clearer indication of how policy will be developed, particularly in relation to environmental limits and any critical thresholds relating to maintaining the integrity of European sites, for example critical levels of nitrogen deposition.</p> <p>There are also more specific requirements to maintain the integrity of some sites and it is important that these are recognised and that appropriate policies are in place to support necessary action. This may require:</p> <ul style="list-style-type: none"> • Better understanding of the impacts of air pollution on designated interest features of European

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	<p>sites</p> <ul style="list-style-type: none"> • Better understanding of the likely effects of climate change on the integrity of European sites, particularly riverine SACs • Stronger efforts to ensure appropriate land use around European sites, possibly using green infrastructure initiatives as a delivery mechanism • Stronger efforts to support European protected species outside European sites <p>Integrated and partnership working to monitor and assess effects on European sites which straddle regional boundaries or are affected by development in more than one local area.</p>
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11.4 Quality of the Environment Policies

Policy objectives	Vary for different areas of policy (to be completed)
Recommended policy approach	<p>These policy recommendations update Part 1 of the existing RSS Quality of the Environment chapter on environment policies. They provide updates for Policies QE2 and QE4-8, and for the text on protection of agricultural land and air quality.</p> <p>Policy QE3: Creating a High Quality Built Environment for All has been incorporated into the RSS Phase Two Revision Sustainable Region policies. Policy QE9: The Water Environment and the paragraphs on development and flood risk are being revised as part of the RSS Phase 2 Revision, so are not included in this revision. Policy QE10: Transforming the Environment of the Black Country was included as part of the Phase One Revision issued in January 2008 and is not going to be revised further.</p>
Sites affected	All sites.
Main implications for the integrity of sites	Implications for individual sites are difficult to appraise without more spatial information.

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	<p>The potential role of environment policies in delivering mitigation is particularly important with respect to: Green infrastructure (Policy QE4), Protecting, Managing & Enhancing Region’s Biodiversity & Nature Conservation Resources (Policy QE7) and Positive Uses of the Greenbelt because these all provide scope for enhancing the supporting functions of land around European Sites.</p> <p>Policies on air quality and energy efficiency could also have a positive influence on the 13 sites in the region which are over their critical loadings for certain air pollutants. There are some sites which require monitoring of the effects of traffic emissions from neighbouring major roads.</p>
Mitigation recommended	To be completed
Residual issues to address	<p>It is important to emphasise the need for a stronger evidence base to support future assessments of impacts on the integrity of European sites. In particular there are some sites which require monitoring to determine how levels of deposition of atmospheric pollutants translate into significant changes in plant community composition “on the ground”.</p> <p>Climate resilient habitat networks will become increasingly essential to maintain the integrity of European sites as the climate changes. In the same way that minerals can only be extracted where they occur, climate resilient habitat networks can only be designed and created where they will be ecologically effective. There are likely to be spatial conflicts between these and land-use change aspirations inherent in other regional policies. It is therefore extremely important that the concept is addressed in regional policy. This could be addressed in the integrated approach to the management of environmental resources or in QE7.</p>

11.5 Safeguarding Mineral Resources including Brick Clay Provision

Policy objectives	To ensure that the economically important minerals in the region are safeguarded
Recommended policy approach	<p>Encourages Local Planning Authorities, Minerals Planning Authorities, the minerals industry and developers to work together. Also encourages Mineral Planning Authorities to ensure that the following regionally important minerals and minerals and minerals related infrastructure are safeguarded in their LDFs:-</p> <ul style="list-style-type: none"> • brick clays – new housing and built development (including house renovations and extensions), employment and providing security of supply for other downstream markets; • fireclays – new housing and built development (including house renovations and extensions), and employment • aggregates – new housing, built development and infrastructure provision, employment and providing security of supply for local markets; • Natural building and roofing stone – maintaining regional and local distinctiveness and for use in the historic environment. • Hydrocarbon resources (coal, gas and coalbed methane) – contribute to national energy security having regard to climate change considerations.
Sites affected	<p>Sites near existing minerals extraction locations include:</p> <ul style="list-style-type: none"> • Peak District Dales SAC • Staffordshire Moorlands SAC • River Mease SAC • River Wye SAC

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	<ul style="list-style-type: none"> • Midlands Meres and Mosses Phases I and II Ramsar <p>Further work is required to confirm implications for other sites, but this requires more information on how the regional apportionment would be met (subject of a separate assessment)</p>
<p>Main implications for the integrity of sites</p>	<p>Safeguarding of mineral resources from other forms of development does not necessarily commit to extraction from those areas safeguarded.</p> <p>However it is important to note that mineral extraction from areas within European designated sites would not be possible unless it could be demonstrated through HRA that there would be no adverse impact on the integrity of those sites.</p> <p>All minerals related applications can have off-site impacts and will require assessment against potential adverse effects on European sites.</p> <p>While the recommended policies state that the designation of MSAs does not necessarily mean that extraction applications will be granted, the implication that applications will be regarded favourably is of some concern for two reasons.</p> <p>First, the recommended non-exclusion of internationally designated areas from MSAs (paragraph 19) misleads with regard to the extent of the mineral resource. Any application to extract minerals from a European Site would be likely to damage the integrity of the site and would only be permitted if no other alternatives were available and for reasons of overriding public interest.</p> <p>Secondly, there is some concern, as raised in the Sustainability Appraisal, that the extent of MSAs as recommended in these policies, could distort local spatial decisions on development of housing and employment land, and result in development in less sustainable locations with regard to sustainable transport, distance travelled, and effects on habitats that may be supporting European sites, or have the potential to do so in the future in climate resilient habitat networks. The strength of this concern is difficult to appraise because of uncertainty over the flexibility of the “where appropriate” phrase in paragraph 19. Notwithstanding this uncertainty, it is clear from GIS analysis of potential MSAs, that if there is no flexibility, many settlements in the region with high housing allocations will be severely restricted in where they can be allocated.</p> <p>It is also noted that, while there is a proposed policy here on safeguarding of coal mineral resources, there</p>

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	is no policy on sub-regional allocation of coal extraction in the same way as there is for aggregates. This is of some concern as we believe there is at least one current proposal in the region for open cast coal mining in close proximity to a European site.
Mitigation recommended	[To be completed]
Residual issues to address	[To be completed]

