

WMRSS Phase Three
Habitats Regulations review of
Policy Recommendations to inform
development of the new Regional Strategy

West Midlands Regional Assembly

Issue 4: March 2010

Compiled by

Treweek Environmental Consultants

Disclaimer:

This report has been prepared by Treweek Environmental Consultants with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. This report is confidential to the client, and Treweek Environmental Consultants accepts no responsibility whatsoever to third parties to whom this report, or any part thereof, is made known, unless formally agreed by Treweek Environmental Consultants beforehand. Any such party relies upon the report at their own risk. Treweek Environmental Consultants disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.

SUMMARY

The West Midlands Regional Spatial Strategy (WMRSS) Phase 3 Revision is to be taken forward into the new Regional Strategy (RS) through Interim Policy Statements that will provide guidance to assist the preparation of Local Development Frameworks and also through the Policy Recommendations which are reviewed in this report. Treweek Environmental Consultants (TEC) was appointed by the West Midlands Regional Assembly to consider the possible implications of the **Policy Recommendations** for European Sites. Habitats Regulations Assessments of two **Policy Statements** are presented in separate reports (TEC 2010b and TEC 2010c).

An HRA Screening Report (TEC, 2009) was produced for emerging Phase 3 policies in the West Midlands Regional Spatial Strategy at the options consultation stage in summer 2009. This report builds on that screening report and the results of subsequent reviews and consultation. It examines the likely relationships between policy recommendations and European Sites and identifies issues which will need to be given further consideration before policies are finalised in the Regional Strategy.

The results of the assessment should be regarded as provisional at this stage as the policy recommendations represent an interim stage in the process and will be finalised for inclusion in the RS. The results are intended to inform further development of policy and to help ensure that adverse impacts on European sites are avoided from the outset. Some recommendations have already been included in the policy recommendations. Where possible we point out where such changes have been made. This report does not therefore constitute a final Stage 2 Appropriate Assessment under the requirements of the Habitats Regulations but is intended to inform such an assessment in future. Subsequent assessments will be able to provide more precise information on specific effects on sites provided that the spatial aspects of the policies are further developed before inclusion in the RS.

CONTENTS

1	Introduction.....	5
1.1	Requirement for Habitats Regulations Assessment of Development Plans	5
1.2	The Policy Statement on Regional Strategies.....	6
1.3	Approach	8
2	The West Midlands RSS.....	9
2.1	Summary of approach to Phase 3	10
2.2	Summary of policy recommendations	11
2.3	Summary of policy statements.....	12
3	European Sites.....	13
4	Results and recommendations	17
4.1	Rural Services	17
4.2	Culture and Sport	18
4.3	Tourism and the Visitor Economy	19
4.4	Integrated Approach to Management of Environmental Resources	29
4.5	Other Policies relating to Quality of the Environment	29
4.6	Safeguarding Mineral Resources in the West Midlands	31
4.7	Regional Policy Statements	33
5	Conclusions.....	33
5.1	Specific issues for which more detailed consideration is required before finalising policy	34
6	References.....	43
7	Appendix 1 Sensitivities of European Sites	44
8	Appendix 2: Summaries of policy recommendations and sites affected	48
8.1	Rural Services	48
8.2	Culture and sport; tourism and the visitor economy	50
8.3	Integrated approach to the management of environmental resources	52
8.4	Quality of the Environment Policies.....	55
8.5	Safeguarding Mineral Resources including Brick Clay Provision	57
8.6	Summary of impacts requiring further consideration.....	60
9	Appendix 3: European Sites Vulnerable to Increased Air Pollution/ Deposition Levels .	65

1 Introduction

The West Midlands Regional Spatial Strategy (WMRSS) Phase 3 Revision is to be taken forward into the new Regional Strategy (RS) through Interim Policy Statements that will provide guidance to assist the preparation of Local Development Frameworks and also through the Policy Recommendations which are reviewed in this report. Treweek Environmental Consultants (TEC) was appointed by the West Midlands Regional Assembly to consider the possible implications of the **Policy Recommendations** for European Sites. Habitats Regulations Assessments of the **Policy Statements** are presented in separate reports (TEC 2010b and TEC 2010c).

This report identifies key constraints and issues that need to be taken into account when developing the Phase 3 Policy Recommendations further as part of the new RS. HRA will be required for the new Regional Strategy (RS) and this report is intended to 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
- Safeguarding Minerals

Implications of the new Regional **Policy Statements** on provision of sites and pitches for gypsies and travellers and on the sub-regional apportionment for Minerals and Aggregates are addressed in separate reports as indicated above.

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.

1.1 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.

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

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).

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 is intended to feed into a Stage 2 Appropriate Assessment as part of the HRA for the new Regional Strategy.

1.2 The Policy Statement on Regional Strategies¹

This section explains briefly how policies are likely to be taken forward in the Regional Strategy and gives an initial indication of how implications for European sites might be addressed as part of this process.

The Policy Statement on Regional Strategies says that they must be "based on a sound evidence base, supported by a sustainability appraisal which includes consideration of environmental limits and a Habitats Regulation Assessment and other required assessments". The need for more rigorous consideration of environmental limits is one of the issues identified in this review. DCLG (2010) also indicates, however, that RSs should not

¹ <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1479804.pdf>

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

be “Site Specific” and this could make it difficult to obtain some of the evidence needed to reach firm conclusions about the implications of policy for European sites.

Another important requirement is that for joint working where sub-regions cross regional boundaries, or where there are obvious inter-regional issues to consider such as the implications of development at a catchment scale or in relation to growth areas or National Parks which straddle regional boundaries. There are several European sites which are inter-regional and which are exposed to pressures from growth in more than one region. This report has identified some cases where joint working is likely to be required before policies can be finalised in the RS, notably those European sites which are important for tourism. In such cases “regions should work with responsible regional authorities in those regions”.. “and jointly consider shared priorities within their respective Regional Strategies”.

Regional Strategy’s are required to address the issues summarised in Table 1, which also considers how implications for European Sites might be addressed and therefore how the results presented in this report might need to be incorporated.

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

Issues identified in the 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. The results of HRA of the WMRSS Phase 2 will need to be re-visited.
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.	Climate change could have significant implications for the integrity of many European Sites. Development of climate resilient networks of habitat could have some benefits. Increased pressure on the Severn Water Resource Zone is one issue already 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 issues including opportunities for business growth and attractiveness for business	Location of growth areas is important, but at least some understanding of likely location is essential to understand implications for European sites. Where such areas are located in relation to key infrastructure and housing needs to be considered in terms of implications for diffuse air pollution associated with transport.

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

investment as well as relative deprivation, worklessness, economic and environmental inequalities, health and social inequalities, social exclusion, skills levels, housing stock and the adequacy of infrastructure provision.	
6. Transport needs and services in delivering sustainable economic development, regeneration, investment, housing growth and climate change mitigation. The strategy and its implementation should seek to integrate transport and, where possible, create and secure opportunities for sustainable options such as improved public transport, cycling and walking.	This places strong emphasis on the need for sustainable transport solutions and this is a key issue in the West Midlands, where levels of diffuse air pollution are already high and having an adverse effect on several European sites. There are also inter-regional issues to consider due to possible transport of air pollution into Wales and into neighbouring regions in England. Joint inter-regional working is also likely to be required to develop effective mitigation strategies.
7. How the Strategy's plans for sustainable economic growth, housing and other development have taken account of available infrastructure, including environmental infrastructure, and its capacity and what strategic requirements, demand reduction, management and provision of infrastructure and services are needed to support the future development of the region, including communications, energy, waste, water and minerals.	It is important for future reviews of environmental capacity to include careful consideration of implications for European sites from the beginning. The evidence base required is currently lacking (see Issue 8).
8. 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. This information is not currently available with respect to many issues. For example there is little air quality monitoring data and further work may be required on future demand for water with respect to climate change.
9. 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.
10. Priorities for widening access to culture, media and sport.	Possible conflicts with priorities established in (7) above need to be considered.
11. Other action essential to support outcomes.	

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 Recommendations. This review was undertaken in parallel with Sustainability Appraisal (SA) carried out by URSUS (2010). Interim Policy Recommendations were reviewed and amended based on results of consultation as well as the findings of the HRA and SA. Natural England and the Countryside Council for Wales provided comments and suggestions based on reviews of three iterations of policy recommendation.

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

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. Recommendations for avoidance or mitigation of effects on the integrity of any European site are included in the report.

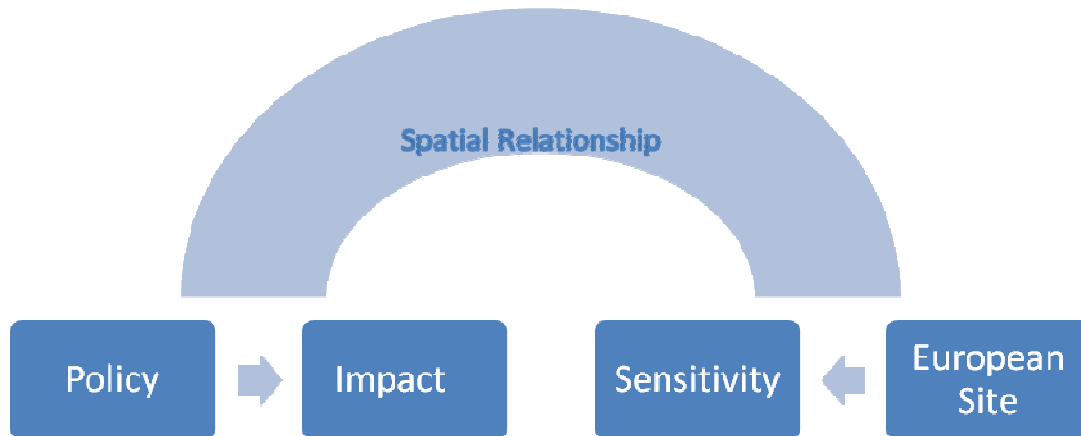


Figure 1 Assessment Process Summary

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 as well as the condition of the European site and other existing external influences (see Figure 1).

Impacts occurring because a proposed development is within a European site are relatively straightforward to assess. Most potential impacts, however, have sources off-site. For some of these impacts, it may be possible to identify an area or "impact zone" within which significant effects might be expected to occur. Whereas the locations and boundaries of European Sites are known precisely, however, the spatial precision of policy recommendations is highly variable and generally low. 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, at this stage, to conclude with any certainty whether or not a particular site's interest features will be exposed or affected to any significant degree.

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.

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

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. The Draft Phase Two Revision was 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. At the time of writing (March 2010) the Department for Communities and Local Government (CLG) has advised that further work is required before the Secretary of State can publish his Proposed Changes. CLG have advised that the Secretary of State hopes to be in a position to publish the Proposed Changes by July 2010.
- 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 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. Policy statements will have material consideration status in the planning process pending their incorporation into the Regional Strategy.

The proposed Policy Recommendations addressed in this report form part of the preparation process for the new Regional Strategy but do not have such status.

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

The implications of the draft policy 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. It does not present final conclusions concerning impacts on European sites as the policy recommendations reviewed here do not represent final policy.

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 new and existing 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 European 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 transport-related 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 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. Policy on renewable energy perhaps represents an anomaly as renewable energy projects can also have adverse effects (see below).

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. Proposals for development of renewable energy in particular can have adverse effects depending on where they are located and how they are implemented. Although they can be expected to have environmental benefits through reduced carbon emissions, specific proposals affecting European sites would require HRA. 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. These are addressed in separate reports, but are described briefly here for information.

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. On 29th June 2009 the Government issued revised national and regional guidelines for the provision of aggregates for the period 2005-2020. The new guidelines replace the June 2003 guidelines which are incorporated in Policy M2 of the West Midlands

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

Regional Spatial Strategy (WMRSS) which was approved in June 2004. The revised regional guidelines indicate a total aggregates provision in the West Midlands of 370 million tonnes to be provided over the next 16 years. This comprises 165 mt of land-won sand and gravel, 82 mt of land-won crushed rock, 100mt alternative materials and 23 mt of net imported material.

Before the regional guidelines can be used in the preparation of minerals development plans they need to be broken down, as far as possible, to Mineral Planning Authority (MPA) areas. This apportionment of the regional guidelines is the responsibility of the WMRA (as the Regional Planning Body), taking into account advice from the MPAs and the West Midlands Regional Aggregates Working Party (WMRAWP). Various options and scenarios were developed and considered to suggest how this total level of provision might be met, including suggested sub-regional apportionments.

2.3.1 Gypsies and Travellers

There is a regional 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 expected to 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.

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		

The following chapter considers effects in more detail.

Table 3 draws on the screening assessment for WMRSS Phase 3 in terms of the European sites which could be affected and the main drivers for adverse effects (TEC 2009b). The table has been amended to reflect the results of consultation and the revision topics presented in the table have been revised to cover those now addressed through the Policy Recommendations. The following chapter considers possible effects in more detail.

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

Table 3 Phase 3 Revision Topics and European sites likely to be affected

Phase 3 Policy Recommendation	Key drivers for adverse effects	European Sites which could be affected
Rural Services	Diffuse and/or local air pollution largely due to changes in transport patterns, which are difficult to predict.	<p>Many in the region, but in particular those affected by diffuse air pollution or by traffic-related emissions from roads within 200m of a site (these are highlighted in bold), likely to include at least:</p> <p>Berwyn & South Clwyd SAC, Elenydd Mallaen SAC/SPA, Brecon Beacons SAC and Elan Valley Woodlands SAC, Cannock Chase 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, West Midlands Meres and Mosses Phases I and II Ramsar.</p>
Culture and Sport; Tourism and the Visitor Economy	Disturbance, transport-related pollution, localised physical damage. Effects difficult to predict with any precision as not spatially precise.	<p>Many sites in the region, in neighbouring regions and in Wales could be affected, depending on more detailed (and spatially precise) policy.</p> <p>Sites vulnerable to adverse impacts from further recreational use or increased visits for tourism are 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.</p>
Integrated Approach to Management of Environmental Resources and associated Quality of the Environment Policies	Many possible implications for European Sites, but also scope to use these policy recommendations to make European Sites more resilient to effects of changes in land use.	All sites, but with some specific risks, for example in relation to land use changes within the greenbelt or constraints on location of renewable energy proposals.

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

<p>Minerals: development of policies on safeguarding mineral resources and the future supplies of construction aggregates and brick clay</p>	<p>Land take, disturbance, change in water levels and water pollution arising from future workings. Possible air pollution related to transport and local dust deposition.</p>	<p>Safeguarding of mineral resources does not necessarily mean impacts on European sites will occur: this depends on proposals to expand existing workings or develop new sites. A separate HRA report has been produced for the sub-regional apportionment.</p> <p>Sites near existing minerals extraction locations include:</p> <ul style="list-style-type: none"> • Cannock Chase SAC (Rugeley and Pottal Pool Quarries). • Downton Gorge SAC (Leinthall Earls and Bromfield quarries). • Midlands Meres and Mosses Phases I and II Ramsar (Wood Lane Quarry and Weavers Hill Quarry). • Peak District Dales SAC (Cauldon Low Quarry), Wolsely Park Farm Borrow Pit). • River Mease SAC (Barton Quarry, Alrewas Quarry, Elford). • River Wye Afon Gwy (Wales) SAC (Lugg Bridge, Wellington South).
--	--	--

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. Further information is provided in Appendix 2.

4.1 Rural Services

4.1.1 Summary of policy approach

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 and this emphasis has been further strengthened in refining the recommendations. The main recommendation feeding into the Regional Strategy is to embed “bottom up” planning approaches which meet locally identified needs with an emphasis on sustainability.

4.1.2 Impacts on European Sites

Impacts on sites could be varied and many sites could be affected, depending on the spatial distribution of new development delivered through this policy.

The overall emphasis of this area of policy is largely beneficial to European sites, because it promotes local service 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.

There remains a risk that air emissions could potentially increase, depending on the success with which local service provision is achieved. The sites at risk of any increases in air pollution are identified in Appendix 3.

Rural renaissance is also promoted in the region through other strategies and plans which could have in combination effects. “Rural Renaissance - Advantage West Midlands’ Rural Framework”, for example promotes rural economic activity in the region. Although not specifically highlighted, activities promoted through this framework could include activities such as tourism and recreation which might lead to increased pressure on protected sites as well as increased levels of transport-related air emissions. The Rural Development Programme for England 2007-2013 could also increase pressures on some sites from promotion of increased public access through increased levels of physical damage, disturbance and air pollution.

4.1.3 Recommendations for mitigation or further action

Policy recommendations have been amended to reflect earlier conclusions from HRA concerning the need to minimise transport-related air emissions in the region when

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

developing rural services. There is no reason why the current policy recommendations should necessarily result in significant adverse effects for any European Site.

More detailed policy recommendations which could cause local changes in transport-related emissions would require further assessment in any case where a European site could be affected, particularly those already over their critical loadings for nitrogen or acid deposition (see Appendix 3).

4.2 Culture and Sport

4.2.1 Summary of policy approach

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 Impacts on European Sites

At this stage in the development of policy, it is unclear what form any new development would take or where it might be located. It is therefore not possible to assess possible implications for European sites in any detail. However there is no reason why the current policy recommendations relating to promotion of culture and sport should necessarily result in damage to any European site.

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, especially as the demand for these facilities is likely to be highest in high population centres and the policy recommendation promotes their development in areas that can most easily be reached by sustainable transport modes.

There are some sites in the region already used for sporting activities, however. Those in the vicinity of the city of Birmingham itself (which is picked out for particular consideration in the policy recommendations) are the Cannock Extension Canal SAC and Cannock Chase SAC. Elsewhere in the region, European sites are used for a range of sporting and recreational activities including water-based sports, walking, climbing and caving. In most cases it should be possible to manage impacts of such activities at a local or site-level, through suitable site-specific management measures. As currently worded the policy recommendation does not give rise to any predictable increase in levels of sporting activity affecting European sites either in the West Midlands, in neighbouring regions of England or in Wales. It is hard to determine whether this policy will have any significant influence on European sites on top of predicted population increases, new housing growth and increasing mobility driven by the current RSS (and Phase Two changes) and other external influences such as increased affluence and ownership of private cars.

This is seen as a growth sector in the region, but includes a wide range of activities and it is not clear at this stage which areas or locations might be promoted. The Phase Three policy approach could potentially have in combination effects with other strategies and policies. The West Midlands Health and Well-Being Strategy, for example, could increase the number of people using the countryside and green spaces and thereby increase levels of use of European sites but it is equally possible that pressure on sites could reduce if people have

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

wider and more local access to opportunities for recreation. It remains difficult to quantify any in combination effect at this stage as the cultural flagship sites (and their proximity to European sites) are not specified.

4.2.1 Recommendations for mitigation or further action

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 and more information is available about possible locations or priorities for development. Specific proposals to develop the infrastructure required for promotion of cultural or sporting activities or events would require HRA in any case where a European site might be affected. There is no reason why the policy recommendations need necessarily result in any adverse impact on a European site and it is also possible that increased access to cultural and sporting activities might reduce pressure on European sites by providing alternative opportunity for recreation and amenity close to population centres.

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 be promoted or further developed (for example through green infrastructure initiatives) to reduce pressure on those European sites for which visitor number are reaching a critical limit beyond which site-based management solutions will be inadequate. Proposals to develop opportunities for improved access to sporting and cultural sites should also be developed with a view to avoiding further contributions to diffuse air pollution in the region.

4.3 Tourism and the Visitor Economy

4.3.1 Proposed Policy

The main aim is to strengthen regional policy to meet the strategic 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. In addition, the Policy Recommendations refer to the Wye Valley, the Cotswolds, the Shropshire Hills, Cannock Chase AONB and the Peak District National Park.

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.

4.3.2 Implications for European Sites

There are several European sites which are affected by tourism impacts already and for which specific safeguards might be required when policies are further developed in the RS.

These include those sites within areas targeted for promotion of tourism including the River Wye SAC, Cannock Chase SAC and the Peak District Dales SAC and the Peak District Moors (South Pennine Moors Phase 1) SPA. It is important to recognise that policies promoting tourism and the Visitor Economy in the West Midlands are likely to have implications for

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

sites in other regions and in Wales. Those Welsh sites which are easily accessible from the West Midlands therefore also need to be considered. These sites include:

- Berwyn and South Clwyd Mountains SAC
- Brecon Beacons SAC
- Llangorse Lake SAC
- Montgomery Canal SAC
- Rhos Goch SAC
- River Dee and Bala Lake SAC
- River Usk SAC
- Sugarloaf Woodlands SAC
- Wye Valley Woodlands SAC

Implications of tourism on European Sites are summarised in Table 4. The main impacts associated with tourism development are driven by:

- Physical damage (for example caused by trampling/ erosion)
- Disturbance
- Deposition of atmospheric pollutants, largely derived from traffic emissions

Increasingly pressures from tourism are becoming inter-regional due to access predominantly by car and often from considerable distances away. The Peak District National Park, for example, is thought to be easily accessible by 16 million people living within 60 miles (or an hour travel) of the boundary. Growth in all of the regions bordering on the Park can be expected to increase tourism impacts on the relevant European sites.

Traffic emissions are therefore an important source of impact. Tourism transport contributes 8% of CO₂ equivalent emissions at the European level (Welsh Assembly Government, 2007). In the UK as a whole, only about 22% of tourists use public transport when visiting a tourist destination. In Wales the figure is lower (only 13%). Policies promoting tourism can be expected to increase the risk of impacts on European sites due to emissions from traffic unless specific measures are undertaken to reduce car dependence.

At present approximately 90% of visitors to the West Midlands are on day trips. All European sites in the region are theoretically accessible in a day from most of the West Midlands conurbations, and most of the previously listed Welsh sites are as well. This makes it all the more important to consider how site-specific solutions can be developed to manage visitor pressures and to seek integrated solutions to possible impacts associated with transport. There remains a clear need for integration of planning for transport across national and regional boundaries to ensure that policies are compatible with the needs of European sites. In March 2009 the Department for Culture, Media and Sport and the Department for Transport issued “Sustainable tourism in England: A framework for action—meeting the key challenges”. This recognises the need for integrated transport solutions, some of which might require integrated working with neighbouring regions and with policy makers in Wales. Guidance on the new Regional Strategies (DCLG 2010) also stresses the need for inter-regional working in cases such as this.

There are also potential in combination effects. Other West Midlands strategies and frameworks relevant to promotion of tourism have been identified which could result in increased visits to European sites in the region. In addition to the RSSs for neighbouring regions in England and the Wales Spatial Strategy they include:

- Connecting to Success - West Midlands Economic Strategy: Increased visitor numbers and longer stays may subject sites to increased visitor pressure and disturbance.

WMRSS Phase 3 Policy Recommendations: Implications for European 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.

There are also some other strategies and plans which are designed to offset adverse effects, and which could play a large part in influencing impacts on the ground. The Peak District National Park Recreation Strategy, for example, whilst including actions to improve access to the National Park also includes actions to reduce the impact of recreation and achieve a greater level of control of access. The actions of the Recreation Strategy include several which are intended to improve the sustainability of transport to and within the Park:

- A3. Developing and promoting cycling and walking routes linked to urban areas.
- B3. Providing safe, clearly marked off-road trails at key access points to the National Park; for people of all abilities to walk, run or ride.
- B4. Promoting recreation events suitable for a range of abilities linked to public transport.
- C1. Developing and promoting public transport links from surrounding urban centres, transport hubs and settlements in the National Park.
- C3. Developing facilities and services at key sites in or close to the National Park that are accessible by public transport, cycling or walking.
- C4. Addressing potential impacts of climate change and using sustainable development techniques for new or enhanced recreation facilities (e.g. emissions reductions, use of water, rate of soil erosion).
- C5. Promoting sustainable travel choices e.g. linked public transport routes, campaigns, offers and initiatives.
- C7. Working with partners to encourage the development of 'green' recreational products linked to sustainable transport.
- E3. Developing a strategic approach to the provision of facilities such as toilets and car parks.

It is also necessary to consider initiatives to promote tourism in Wales. 'Visit Wales' is the body responsible for providing leadership and strategic direction to the tourism industry in Wales. The medium-term national tourism strategies define a vision for tourism, establish priorities for partnership action and set targets for growth. Objectives include:

- Improving the competitiveness of Welsh tourism.
- Raising the profile and status of the industry and increase recognition of its economic performance.
- Adopting a customer-focused approach which understands and responds to market needs.

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

- Improving understanding of the roles and responsibilities of the different organisations involved in tourism and identify opportunities for effective partnership working.
- Promoting growth in tourism through sustainable means.

Welsh policies promoting tourism recognise that the quality of the environment in Wales is the main motive for staying holiday tourists and tourist leisure day trips in Wales, and that the economy and the environment cannot therefore be viewed separately. Particular challenges to the quality of the landscape include damage from over-use by visitors and specific intrusive activities.

Welsh strategies and policies to promote tourism are likely to be the main driver for possible increases in tourism impacts on European sites in Wales, but the West Midlands' tourism policies could also increase visitor numbers to some Welsh sites. It is not possible at this stage to predict effects with any precision at a site level, but it is important to recognise the possibility of trans-boundary impacts and integrated approaches should be considered with a view to development of sustainable transport solutions. 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, potentially increasing pressure on them.

4.3.3 Recommendations for mitigation or further action

It is important to recognise that policies promoting tourism and the Visitor Economy in the West Midlands could have implications for sites in other regions and in Wales and this will add to pressure already associated with population growth and housing development on a considerable scale. There remains a need for integration across national and regional boundaries to ensure that policies are compatible with the needs of European sites. The need for this is reinforced in "Sustainable tourism in England: A framework for action—meeting the key challenges" (March 2009) issued by the Department for Culture, Media and Sport. This included collaboration with the Department for Transport concerning the need for integrated transport solutions, some of which might require integrated working with neighbouring regions and with policy makers in Wales.

This is a key issue for policies promoting the countryside, canal network, and market towns/cathedral cities as hubs of tourism activity. It is important to note that the countryside in general, the canal network and market towns in the region 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. Although HRA will be required for any specific proposals affecting these sites, further development of policy promoting use of the canal network should make specific reference to possible risks to the integrity of canals or waterways designated as European sites, notably the Montgomery Canal SAC in Wales and the Cannock Extension Canal SAC in the West Midlands. Site-level management solutions may be possible to accommodate additional visitor numbers to these sites, but it is not clear at this point what quantum of increase can be expected.

Main recommendations to avoid adverse impacts on the integrity of European sites

Ensure that policies promoting use of the canal network make specific reference to any risks to the integrity of those waterways which are designated as European sites, in particular Cannock Extension Canal SAC.

Joint working with neighbouring authorities (in other Regions of England and in Wales) should be promoted to develop integrated transport solutions. This is required to minimise risk of increases in deposition of atmospheric pollutants affecting European sites already over their critical loads for Nitrogen and Acid deposition derived from increased traffic emissions (see Appendix 3).

Carry out research at regional level to establish the extent to which European sites constitute key tourism assets. For those sites which are, it is important to establish the extent to which additional tourism can be accommodated through site-based management solutions. Further work is also required to determine likely distances travelled to access these sites. This is necessary to establish the baseline needed to predict the impacts of increased housing development in the West Midlands on visits to European sites in the West Midlands, neighbouring regions of England and Wales.

To support future HRA of tourism proposals affecting European sites the following recommendations are given:

- Specific assessments are needed for certain European sites, notably the River Wye SAC, the Cannock Extension Canal SAC and the Montgomery Canal SAC to establish the extent to which they are able to accommodate additional visitors.
- Specific assessments are needed for the Peak District Dales SAC, the Peak District Moors (South Pennine Moors Phase I) SPA, the South Pennine Moors Phase II SPA and the South Pennine Moors SAC to establish the extent to which they are able to accommodate additional visitors and to also to establish the likely responses of designated interest features to the different levels of air pollutant deposition which could occur as a result of additional diffuse and local air pollution associated with different levels of visitor traffic. Without this information, it will remain difficult to appraise policy with any confidence or have any certainty about conclusions reach, making a precautionary approach necessary.

As part of the process of developing the RS it will be necessary to give careful consideration to these two issues with respect to establishment of clear environmental limits. A stronger evidence base is required to develop robust recommendations. Obtaining some of the necessary information and carrying out the necessary appraisals is likely to require a regional-level approach with involvement of National Park Authorities, regional planning bodies, Natural England and CCW.

In cases where a European site (which is over its critical load for acid or nitrogen deposition) 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.

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

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. The current policy recommendations do not name individual strategic assets, so it is not possible to identify specific risks to European Sites at this stage.</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: there are several European sites which might be seen as "visitor attractions" but these are not currently named in policy.</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>

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

<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</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>

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

<p>environment and design, forming key elements of the unique place-based character of destinations</p>	
<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>

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

<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>
<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>

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

<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

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. This should also help to mitigate against the increasing impacts associated with the housing and infrastructure development promoted under the RSS and Phase Two Revision. 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.
- Better understanding of how European sites are located with respect to key sources of damage or risk (the need for a review of the extent to which Mineral Safeguarding Areas overlap with European sites is an example).
- Stronger efforts to ensure appropriate land use around European sites, possibly using green infrastructure initiatives as a delivery mechanism to ensure that supporting habitat is maintained and that sites are buffered from damaging effects of land use change.
- 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

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

- Green Infrastructure
- Protection & Enhancement of Historic Environment
- 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 but in some cases will need to be strengthened so that they perform an assured role in mitigating effects of growth promoted elsewhere in the RSS.

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. However the level of development proposed in the RSS as a whole makes it increasingly likely that land use will change in and around the greenbelt, and it is important that any such changes are strategically considered in relation to implications for European sites. Policies on air quality and energy efficiency could also have a positive influence on those sites which are over their critical loadings for certain air pollutants.

Implications for individual sites are difficult to appraise without more spatial information. Policies relating to development of Renewable Energy (targets and criteria for ensuring that renewable energy projects are appropriately located) do refer to possible implications for European sites ("elsewhere the location of many mineral resources coincides with international and national environmental and nature conservation designations such as Areas of Outstanding Natural Beauty and Special Areas of Conservation (and candidates)"), but don't give a clear indication of what measures should be taken to avoid adverse effects. Individual proposals to develop renewable energy could have adverse effects on European sites depending on where they are located and how they are implemented, so HRA would be required for any such proposal.

4.5.3 Recommendations for mitigation or further action

Priority habitat targets have been developed for the West Midlands and meeting these (Policy QE7) is likely to require habitat creation and restoration at a higher level than has happened in the past. 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 finalising regional policy in this area.

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”.

Policies setting out criteria for ensuring that renewable energy is appropriately located will need to make it clear that proposals likely to have an adverse effect on any European site will be subject to HRA and that permission will not be given to develop any project that would have an adverse effect on the integrity of a European site.

Updating of air quality policies: these are expected to be addressed largely through the revised Phase 2, but until this is released for consultation (possibly not till July 2010) it is important to emphasise the need for a stronger evidence base in relation to increasing risks to the integrity of European sites as a result of air emissions. The current position is unclear due to lack of monitoring data. Available information has all been procured for other purposes (for example in relation to transport modelling) and is not easily adapted for the purposes of predicting actual deposition levels at sensitive European sites.

Stronger policy is required concerning land use change in the greenbelt and possible implications for those European sites located in or near the green belt. It would be useful to explore the potential benefits of consolidating certain European sites through green infrastructure initiatives and through other efforts to ensure that the region’s habitat targets can be met. This is a priority as level of competition for suitable land is likely to increase (for example through minerals safeguarding).

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. Future brick clay provision is also addressed.

One of the national objectives for mineral planning is “to safeguard mineral resources as far as possible”, paragraph 9, Minerals Planning Statement 1 (MPS1). MPS1 provides a stronger national policy for safeguarding minerals by introducing on all Mineral Planning Authorities (MPAs) an obligation to define Mineral Safeguarding Areas (MSAs), with an associated obligation on district councils to show MSAs in district Development Plan Documents. MSAs are intended to ensure that mineral resources are adequately and effectively protected in land-use planning decisions when linked to appropriate local planning policies. The presence of an MSA does not preclude other forms of development, rather they are intended to highlight the fact that minerals may be sterilised by proposed development and that this factor should be considered in its decision-making process regarding that development.

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

On this basis 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”. It is important to stress that the same logic should apply to any case where future development of a minerals resource might have adverse consequences for a European site. Before policy is finalised, it is suggested that consideration should be given to site safeguard areas and a mapping exercise carried out to indicate where there is potential conflict.

4.6.2 Possible Implications for European Sites

Sites near existing minerals extraction locations include:

Sites near existing minerals extraction locations include:

- Cannock Chase SAC (Rugeley and Pottal Pool Quarries).
- Downton Gorge SAC (Leinthall Earls and Bromfield quarries).
- Midlands Meres and Mosses Phases I and II Ramsar (Wood Lane Quarry and Weavers Hill Quarry).
- Peak District Dales SAC (Cauldon Low Quarry), Wolsely Park Farm Borrow Pit).
- River Mease SAC (Barton Quarry, Alrewas Quarry, Elford).
- River Wye Afon Gwy (Wales) SAC (Lugg Bridge, Wellington South).

Any proposals to expand or increase levels of extraction from these locations would require HRA. 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 (TEC 2010b).

While the recommended policies state that the designation of MSAs does not necessarily mean that extraction applications will be approved, the implication that they will be regarded favourably is of some concern for two reasons. First, the recommended non-exclusion of internationally designated areas from MSAs (paragraph 19) misleads with regard to the extent of the mineral resource. It is important to emphasise that any application to extract minerals from a European Site would only be permitted if no other alternatives were available and for reasons of overriding public interest.

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 17. 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.

It is also noted that, while there is a proposed policy here on safeguarding of coal mineral resources, there 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 (Cannock Extension Canal SAC). 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.

4.6.3 Recommendations for mitigation or further action

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”. It is equally important to ensure that minerals safeguarding does not force adverse consequences for any European site, for reducing flexibility to locate other development away from locations where it might have implications for European sites.

Before policy is finalised in the RS it is suggested that a mapping exercise should be carried out to indicate where there is potential conflict between Mineral Safeguarding Areas and areas where development could have consequences for a European site OR its supporting habitat (“site safeguard areas”. Policy in the new RS should emphasise more strongly the need to take risks to European sites into account when considering apportionments (see also separate HRA of the sub-regional apportionment).

4.7 Regional Policy Statements

Regional Policy Statements are being produced for Construction Aggregates and for Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople. These are addressed in separate reports (TEC 2010b and TEC 2010c).

5 Conclusions

Appendix 2 summarises the results of the review and identifies issues that may need further consideration before policies are finalised in the RS.

The Policy Recommendations reviewed in this report relate to areas of policy which play an important part in mitigating some of the potential adverse effects associated with the RSS as a whole. There is potential for environmental enhancement through many of these policy recommendations, but the outcome is entirely dependent on the quality of implementation and adequate resources being applied. This applies in particular to the “Quality of the Environment Policies”.

Some policy recommendations are incomplete or lack sufficient detail to support meaningful HRA. Renewable energy targets remain to be agreed, for example and there is no policy recommendation concerning use of the greenbelt at this stage.

There also remain some potentially conflicting policies and these conflicts will need to be examined in more detail before the Regional Strategy is finalised, as indicated in **Table 3**. They relate in particular to tensions between growth (and associated air emissions in particular) and the fact that environmental limits have been reached for several European sites in terms of critical loadings of certain pollutants. The implications of climate change and the relative importance of regional carbon emissions remain unclear.

For the RS a clearer picture will therefore be required concerning patterns of growth in the region and their implications for air emissions. Although it is known that many European sites are over their critical limits for air emissions (Appendix 3) it is not at all clear whether the current policy recommendations would translate into an increase or a decrease in overall emissions. A much stronger evidence base is required to avoid over-precautionary approaches in future. This is an area that must be fully covered by regional monitoring so that effective mitigation can be designed into policies before they are finalised in the Regional Strategy.

In addition, in combination effects of other strategies, plans and projects will need to be examined in more detail before policies are finalised in the Regional Strategy. This will be difficult if policies remain non-explicit in spatial terms.

If the spatial specificity of policy remains unclear (which is quite likely under current guidance on Regional Strategies), it will be necessary to consider establishment of stronger site-based constraints and limits on possible development affecting European sites. This will have to be of an extremely precautionary nature without investment in further research and investigation into likely ranges of sensitivity of different designated interest features to different types of activity and impact.

5.1 Specific issues for which more detailed consideration is required before finalising policy

5.1.1 Mineral Safeguarding

MPS1 provides a stronger national policy for safeguarding minerals by introducing on all Mineral Planning Authorities (MPAs) an obligation to define Mineral Safeguarding Areas (MSAs), with an associated obligation on district councils to show MSAs in district Development Plan Documents. MSAs are intended to ensure that mineral resources are adequately and effectively protected in land-use planning decisions when linked to appropriate local planning policies. The presence of an MSA does not preclude other forms of development, rather they are intended to highlight the fact that minerals may be sterilised by proposed development and that this factor should be considered in its decision-making process regarding that development. It is important to stress that the same logic should apply to any case where future development of a minerals resource might have adverse consequences for a European site.

Before policy is finalised it is suggested that consideration should be given to site safeguard areas and a mapping exercise carried out to indicate where there is potential conflict.

Review of proposed landscape scale projects in the region is recommended to ensure that opportunities to deliver them are not compromised by minerals safeguarding policy. The extent to which the proposed minerals safeguarding might affect flexibility of other planning decisions remains unclear and it is important to carry out further review of likely minerals development areas when the sub-regional apportionment is confirmed to ensure that there are no adverse implications for European sites.

5.1.2 Tourism and the visitor economy

There remains considerable uncertainty about the extent to which environmental limits or thresholds might be reached as a result of increased levels of visits to European sites in the region, in neighbouring regions and in Wales. While it is likely that, in the majority of cases, site-based visitor management solutions can be found, there remains a possibility that some sites might be exposed to significant adverse effects on integrity as a result of increasing air pollution. This is an issue for many sites in the country and requires action at all levels from local to national. To avoid a strong precautionary approach being required in every case, it is necessary to give further consideration to the effects of deposition over current levels for designated interest features which are sensitive to air pollution (in particular acid and nitrogen deposition, but also ozone). For sites where this is recognised as a significant issue, it may be necessary to consider other possible measures which could be taken to enhance the resilience of affected plant communities, for example investment in enhanced management or restoration of additional areas supporting that community. In the Peak District Dales SAC, for example, as much as 12% of the site could be affected by deposition of air pollutants from roads located within the site or within 200m of its boundaries. It is unlikely that effective policy solutions will be possible at regional level without further strengthening of the evidence base with respect to responses of affected plant communities. Within the region, in neighbouring regions and in Wales, there are European sites which constitute important tourism and

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

recreational assets. It would therefore be appropriate to consider how some of the economic benefits of tourism and the visitor economy might be channelled into mitigation for possible adverse effects on the integrity of some sites unless pollution-neutral outcomes of policy can be guaranteed.

For sensitive sites work with site managers, Natural England (or CCW) and others is required to review likely responses of designated interest features to additional air pollution (acidification, eutrophication and pollution by ozone) and to evaluate likely consequences for integrity of the sites supporting these features.

For sites where additional car-based transport could affect a significant proportion of the site as a whole possible mitigation measures to restore sensitive plant communities in locations more than 200m from roads on which traffic levels might increase should be identified. Investment in such mitigation may be required, possibly through a levy on operators using European sites to avoid a strong precautionary approach for future proposals. This presents a potential opportunity to combine with efforts to meet the Region's BAP habitat targets.

The following table sets out the issues identified during HRA of the WMRSS Phase 2 for which Phase 3 policies were identified as a possible means of delivering mitigation. A final review of these issues will be required before finalising the RS. This review will also need to take into account the implications of GOWM's revisions to the WMRSS Phase 2 made following the EIP.

Table 5 Issues identified during Phase 2 for which Phase 3 policies might have a role in delivering required mitigation

Issues	Suggestions for Phase 3 as set out in Phase Two Revision HRA and / or the RSS phase 2 preferred option	Has this been tackled through Phs 3 policy recommendations?
background air pollution	Include further measures to deal with diffuse air pollution	To some extent this is addressed, but it is likely that air quality policies will become part of Phase 2 (Policy SR4).
water quality	Policies SR3 and QE9 should be amended from "encouraging consideration of their use" to "using SUDS to reduce any adverse effects on the water environment and especially designated conservation sites".	It is likely that a new policy on Flood Risk will be incorporated in Phase 2. Effects are expected to be largely beneficial for European sites.
recreation/amenity and tourism	Continue to address risk of damage disturbance to European sites	New policies presented for Culture and Sport and separately for Tourism. The policies are not spatially explicit, so there could be risks to any European site in the vicinity of any destination that is promoted. For culture and sport there is no reason why proposed policies should necessarily result in adverse effects on European sites. Tourism impacts are harder to manage as several European sites are already affected by air emissions from transport associated with their use.
land use change and fragmentation	Consolidate and buffer European sites. This should be considered further in the Phase 3 revision, in relation to	Stronger policy wording is required to ensure that benefits can be realised.

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

	Policies QE4 and QE6 as suggested in the Phase 2 HRA.	
spread of invasive species	Inclusion of a commitment to a regional strategy to be developed with the Environment Agency and Natural England to tackle the spread of invasive species throughout the region, including action to stop the spread of, and eliminate invasive species.	No mention.
Mineral workings	Confirm commitment to protected European sites. List any at particular risk	Efforts have been made to ensure that regional safeguarding does not result in an unsustainable sub-regional apportionment, through development of several alternative options. However it will be necessary to produce a constraint or overlay map showing the extent to which MSAs overlap with European sites.

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

Table 6 Summary of policy recommendations and issues requiring further consideration to avoid adverse impact on the integrity of 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, Cannock Chase 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 and South Pennine Moors Phase II SPA.</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
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 participation and engagement in culture and sport.	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.	Specific proposals will need to be appraised in future, depending on their location with respect to European sites.
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.	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>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</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
	<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>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 will be required with site managers to discuss implications of tourism policies for European sites, before policies are finalised for inclusion in the Regional Strategy.</p> <p>In future the evidence base for HRA would be strengthened by conducting specific assessments for the Peak District Dales SAC, the Peak District Moors (South Pennine Moors Phase I) SPA, the South Pennine Moors Phase II SPA and the South Pennine Moors SAC to establish the extent to which they are able to accommodate additional visitors and also to establish the likely responses of designated interest features to the different levels of air pollutant deposition which could occur as a result of additional diffuse and local air pollution associated with different levels of visitor traffic. Without this information, it will remain difficult to appraise policy with any confidence or have any certainty about conclusions reach, making a precautionary approach necessary.</p>
Integrated Approach to the Management of Environmental Resources		
<p>Over-arching policy should help to embed environmental requirements in subsequent stages of planning. This will have positive effects.</p>	<p>Most European Sites potentially affected but effects largely beneficial provided that there is a stronger emphasis on enhancement and delivery.</p>	<p>Dialogue and research into relevant environmental limits is essential to avoid significant adverse effects on European sites in future. The Regional Strategy must give further consideration to (and place stronger emphasis on) the need for policies on green infrastructure, biodiversity and the requirements of European sites to be strengthened in terms of safeguarding supporting habitat for European sites and providing opportunities to enhance climate resilience in future. Policies on renewable energy and energy efficiency are generally beneficial, but there are some conflicts with other areas of policy which promote potentially unsustainable levels of growth and don't provide sufficient confidence that levels of air emissions and water use in the region will not increase.</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
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 ensure delivery “on the ground”	Need to consider role of green infrastructure with regard to biodiversity and landscapes resilient to effects of climate change and 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 for European sites to replace it with woodland)
Protection of Agricultural Land	Land use in the catchment of the River Mease (and other riverine SACs) has a bearing on nitrogen and phosphate-enriched surface water run-off and associated eutrophication, which is already an issue	Further consideration of how protection of agricultural land might affect run off of nitrogen and phosphate-enriched drainage into the River Mease SAC in particular and also other riverine SACs. Regional or sub-regional (catchment level) solutions may be required to avoid exacerbation of adverse effects on integrity of these sites.
Air quality	<p>New text expected to be beneficial, reflecting findings of HRA of Phase 2 and other assessments.</p> <p>Key potential sources of increased emissions of atmospheric pollutants included in Phase 3 are policies relating to tourism, sport and recreation and policies relating to development of rural services. Potential for increased air emissions associated with minerals extraction is considered in a separate report on the HRA of</p>	<p>Sites that could be affected if transport-related air emissions increased are identified in Appendix 3. They are:</p> <p>Berwyn and South Clwyd SAC, Elenydd Mallaen SAC/SPA, Brecon Beacons SAC, Elan Valley Woodlands SAC, Cannock Chase 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, some component sites of the West Midlands Mosses SAC (Chartley Moss), Wye Valley Woodlands SAC,</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
	the Policy Statement for the Sub-Regional Apportionment.	Peak District Moors SPA and South Pennine Moors Phase II SPA. Sites highlighted in bold are those near to major transport routes on which increases in traffic would be expected to cause increased levels of acid or nitrogen deposition over the site's critical load. The Peak District Dales SAC, for example, could have as much as 12% of its total land area within 200m of a road (Environ and TEC, 2010, High Peak Core Strategy HRA screening). Policy SR4 was added to the Phase Two Revision to mitigate for general increases in emissions and to allow for further more detailed assessment in cases where specific sites might be affected by increases in local traffic-emissions on particular road routes. 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 HRAs 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.	See above in relation to strengthening of policy to ensure a consistent approach to climate change.
Renewable Energy - Targets	Targets are not currently specified.	Assessment required when targets have been agreed. A variety of adverse effects are possible depending on the nature of specific proposals. Any located in or near a European site would require HRA.
Renewable Energy – Criteria for Ensuring that Renewable Energy is Appropriate Located	Possible land take, disturbance and mortality related to development of energy infrastructure.	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. There is not currently sufficient information available to make this possible.
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	Assessment will be required when policies have been defined. 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, Mottey

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
	disturbance could have adverse effects. Recommendation not produced for this area of policy at this time.	Meadows SAC. Policy recommendations need to be strengthened in terms of integrating efforts to meet regional BAP targets with measures to buffer European sites. Review of proposed landscape scale project is recommended to ensure that opportunities to deliver them are not compromised by other policies (including minerals safeguarding policies). Consultation with the West Midlands Regional Biodiversity Partnership is required.
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> <ul style="list-style-type: none"> • Cannock Chase SAC (Rugeley and Pottal Pool Quarries). • Downton Gorge SAC (Leinthall Earls and Bromfield quarries). • Midlands Meres and Mosses Phases I and II Ramsar (Wood Lane Quarry and Weavers Hill Quarry). • Peak District Dales SAC (Cauldon Low Quarry), Wolsely Park Farm Borrow Pit). • River Mease SAC (Barton Quarry, Alrewas 	<p>Refer to HRA of sub-regional apportionment (TEC 2010b).</p> <p>Review of proposed landscape scale projects in the region is recommended to ensure that opportunities to deliver them are not compromised by minerals safeguarding policy. The extent to which the proposed minerals safeguarding might affect flexibility of other planning decisions remains unclear and it is important to carry out further review of likely minerals development areas, when the sub-regional apportionment is confirmed, to ensure that there are no adverse implications for European sites.</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
	Quarry, Elford). <ul style="list-style-type: none"> • River Wye Afon Gwy (Wales) SAC (Lugg Bridge, Wellington South). 	

6 References

- APIS (2007). 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
- BGS (2008). Aggregate Resource Alternatives: Options for future aggregate minerals supply in England. British Geological Survey/ Green Balance. Open Report OR/08/025.
- CLG (2009) National and regional guidelines for aggregates provision in England 2005-2020. www.communities.gov.uk
- DCLG (2010) Policy Statement on Regional Strategies. Department for Communities and Local Government. <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1479804.pdf>
- Culture West Midlands (2007). Growing the Cultural Economy in the West Midlands.
- Culture West Midlands (2009). Culture and Prosperity in the West Midlands. The Economic Role of Culture in the West Midlands.
- JEP (2006). 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.
- Land Use Consultants (2009) Appendix B Sub-Regional Apportionment of Aggregates Provision in the West Midlands Region 2005 – 2020, Draft Report, December 2009 (unpublished)
- TEC (2008) West Midlands Regional Spatial Strategy Phase 2 HRA. Report to the West Midlands Regional Assembly.
- TEC (2009a) Information on Natura 2000 Sites in the West Midlands. Unpublished report prepared for Natural England, Treweek Environmental Consultants.
- TEC (2009b) West Midlands Regional Spatial Strategy Phase 3 HRA Screening Report. Treweek Environmental Consultants, for West Midlands Regional Assembly.
- TEC (2010b) West Midlands Regional Spatial Strategy Phase 3. HRA of the Interim Policy Statement for Construction Aggregates. Report to the West Midlands Regional Assembly.
- TEC (2010c) HRA of the Interim Policy Statement on Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople. Report to the West Midlands Regional Assembly.
- URSUS (2010) Sustainability Appraisal of RSS Phase 3 Revision: Sustainability Appraisal Report for the West Midlands. Report to the WMRA.
- Weed, M. E and Bull, C. J. (1999) Integrating sport and tourism: a review of regional policies in England. Progress in Tourism and Hospitality Research. Vol 3(2) 129-147.
- Welsh Assembly Government (2007) Sustainable Tourism: A Framework for Wales. <http://wales.gov.uk/docs/drah/publications/Tourism/090518stframeeng.pdf>

7 Appendix 1 Sensitivities of European Sites

Table 7 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 based on the list used by JNCC in Article 17 Reporting 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.

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

Table 7 Sensitivities of European Sites to Different Types of Impact

Site	Air pollution		Water quality		Water Supply		Biological Disturbance			
	Acidification	Eutrophication	Eutrophication	Siltation/ turbidity	Flow reduction	Reduced water level or supply	Inappropriate grazing or management	Invasive species	Physical damage	Disturbance
Berwyn and South Clwyd Mountains SAC	x	x				x	x	x	x	x
Brecon Beacons SAC	x	x							x	x
Bredon Hill SAC										
Brown Moss SAC	x	x	x	x		x		x	x	
Cannock Chase SAC	x	x	x			x		x	x	x
Cannock Extension Canal SAC	x	x	x		x				x	
Dixton Woods SAC								x		
Downton Gorge SAC	x	x						x		
Elan Valley Woodlands SAC	x	x					x	x		
Elenydd SAC	x	x					x		x	
Elenydd Mallaen SPA							x			
Ensor's Pool SAC				x		x		x		
Fenn's, Wixhall, Bettisfield, Wem and Cadney Mosses SAC	x	x	x	x		x		x	x	
Fens Pools SAC	x	x		x		x			x	

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

Site	Air pollution		Water quality		Water Supply		Biological Disturbance			
	Acidification	Eutrophication	Eutrophication	Siltation/ turbidity	Flow reduction	Reduced water level or supply	Inappropriate grazing or management	Invasive species	Physical damage	Disturbance
Humber Estuary Ramsar	X	X	X		X			X	X	
Humber Flats, Marshes and Coast (Phase 2) SPA	X	X	X		X				X	
Llangorse Lake SAC			X							
Lyppard Grange Ponds SAC	X	X		X	X			X	X	X
Midlands Meres and Mosses Phase 1 Ramsar	X	X	X	X		X		X	X	
Midlands Meres and Mosses Phase 2 Ramsar	X	X	X	X	X	X		X	X	
Mottey Meadows SAC	X	X	X						X	
Pasturefields Saltmarsh SAC	X	X	X	X		X			X	
Peak District Dales SAC	X	X	X	X		X	X	X	X	X
Peak District Moors (South Pennine Moors Phase 1) SPA	X	X							X	
Rhos Goch SAC	X	X	X			X	X			
River Clun SAC			X	X	X			X	X	X
River Dee and Bala Lake SAC			X	X	X			X	X	
River Mease SAC			X	X	X			X	X	X
River Usk SAC			X		X					

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

Site	Air pollution		Water quality		Water Supply		Biological Disturbance			
	Acidification	Eutrophication	Eutrophication	Siltation/ turbidity	Flow reduction	Reduced water level or supply	Inappropriate grazing or management	Invasive species	Physical damage	Disturbance
River Wye SAC			X	X	X			X	X	X
Severn Estuary Ramsar/ SAC/SPA			X	X	X			X		X
South Pennine Moors Phase 2 SPA	X	X	X		X				X	
South Pennine Moors SAC	X	X						X	X	
Sugarloaf Woodlands SAC	X	X					X			
The Stiperstones and the Hollies SAC	X	X							X	
Walmore Common Ramsar/ SPA			X		X					
West Midlands Mosses SAC	X	X	X	X		X		X		
Wye Valley and Forest of Dean Bat Sites SAC	X		X							X
Wye Valley Woodlands SAC	X	X	X					X	X	

8 Appendix 2: Summaries of policy recommendations and sites affected

8.1 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; • Is clear about the approach to be adopted as to how local development may usefully contribute to local regeneration

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

		<p>and needs, i.e. locally identified (bottom up community led) service, facility and infrastructure needs including affordable housing;</p> <ul style="list-style-type: none"> • 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 affected	Sites	<p>All sites in rural contexts could be affected, largely as a result of increases in regional diffuse air pollution, including at least:</p> <p>Berwyn & South Clwyd SAC, Elenydd Mallaen SAC/SPA, Brecon Beacons SAC and Elan Valley Woodlands SAC, Cannock Chase 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, West Midlands Meres and Mosses Phases I and II Ramsar.</p>
Implications for European sites	for	<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 as identified in Appendix 3.</p>

8.2 Culture and sport; tourism and the visitor economy

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 policy approach	Several recommendations relating to promotion of opportunities to participate in culture and sport. None of these are specific in spatial terms.
Sites affected	<p>Key sites in terms of current recreational and sporting use are Cannock Chase SAC, Peak District Dales SAC, South Pennine Moors Phase 2 SPA, South Pennine Moors SAC and the Stiperstones and the Hollies SAC. For water-based recreation key sites are the River Wye SAC and Cannock Extension Canal SAC.</p> <p>All sites in the region and also sites in Wales could be affected by new proposals.</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.
Mitigation recommended	Increased emphasis on development of alternative (non car-dependent) 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>

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

Tourism and the visitor economy	
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 policy approach	The Policy Recommendation seeks to ensure that emerging policy reflects the nature and key characteristics of 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</p>

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

	Pennine Moors Phase II SPA; South Pennine Moors SAC).
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 and residual issues to address	<p>Increased emphasis on development of alternative transport options and on partnership working to develop solutions for trans-boundary sites.</p> <p>Conduct specific assessments for the River Wye SAC, the Cannock Extension Canal SAC and the Montgomery Canal SAC to establish the extent to which they are able to accommodate additional visitors.</p> <p>Conduct specific assessments for the Peak District Dales SAC, the Peak District Moors (South Pennine Moors Phase I) SPA, the South Pennine Moors Phase II SPA and the South Pennine Moors SAC to establish the extent to which they are able to accommodate additional visitors and to also to establish the likely responses of designated interest features to the different levels of air pollutant deposition which could occur as a result of additional diffuse and local air pollution associated with different levels of visitor traffic. Without this information, it will remain difficult to appraise policy with any confidence or have any certainty about conclusions reach, making a precautionary approach necessary.</p>

8.3 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> <p>a) A vision or reference to a vision for the region’s environment for positive enhancement and</p>

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

	<p>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;</p> <p>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;</p> <p>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;</p> <p>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;</p> <p>e) Key integrating themes which will be promoted to ensure multi-functional benefits, and within 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	This area of policy could have considerable benefits for European sites in general through a range of

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

	<p>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>
<p>Mitigation recommended</p>	<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>
<p>Residual issues to address</p>	<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 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 <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>

8.4 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	<p>Implications for individual sites are difficult to appraise without more spatial information.</p> <p>The potential role of environment policies in delivering mitigation is particularly important with respect to:</p> <p>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	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

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

	<p>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>
--	--

8.5 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 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"> • Cannock Chase SAC (Rugeley and Pottal Pool Quarries). • Downton Gorge SAC (Leinthall Earls and Bromfield quarries). • Midlands Meres and Mosses Phases I and II Ramsar (Wood Lane Quarry and Weavers Hill Quarry).

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

	<ul style="list-style-type: none"> • Peak District Dales SAC (Cauldon Low Quarry), Wolsely Park Farm Borrow Pit). • River Mease SAC (Barton Quarry, Alrewas Quarry, Elford). • River Wye Afon Gwy (Wales) SAC (Lugg Bridge, Wellington South). <p>Further work is required to confirm implications for other sites. The sub-regional apportionment is the subject of a separate assessment (TEC 2010b).</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. 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. All minerals related applications 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> <ol style="list-style-type: none"> 1. 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. 2. 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>It is also noted that, while there is a proposed policy here on safeguarding of coal mineral resources,</p>

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

	there 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/ residual issues to address	A mapping exercise is recommended based on overlay of MSAs with potential zones of sensitivity/impact for European sites in the region, so that potential conflicts can be identified.

8.6 Summary of impacts requiring further consideration

Table 8 Summary of impacts on European Sites due to different policy types

SACs, cSACs, SCIs	Rural Services	Culture, Sport and Tourism (two separate policies but similar implications for European Sites)	Quality of the Environment policies in general	Change in the Green Belt	Minerals Safeguarding	Notes
Berwyn and South Clwyd	Transport-related air pollution	Policy more likely to affect sites within West Midlands				Rural renaissance in West Midlands unlikely to be the main driver of further increases in air pollution affecting this site.
Bettisfield, Wem and Cadney Mosses						
Bredon Hill					Possible impacts if existing workings are expanded (existing minerals workings at Lower Moor (5km))	
Brown Moss	Transport-related air pollution	Possible impacts associated with housing growth promoted in Phase 2.				Rural renaissance in West Midlands unlikely to be the main driver of further increases in air pollution affecting this site.
Cannock Chase		Possible increases in visitors and associated disturbance, physical damage, transport-related air pollution.		Any land use change in surrounding area could have implications for levels of disturbance and pollution. Possible beneficial effects depending on policies for enhancing green infrastructure/ biodiversity	Possible impacts if existing workings are expanded (existing minerals workings Pottal Pool Quarry and Rugely Quarry)	
Cannock Extension Canal		Possible increases in use but probably manageable at site level				
Dixton Woods						

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

Downton Gorge	Transport-related air pollution				Possible impacts if existing workings are expanded (existing minerals workings at Leinthall Earls and Bromfield quarries)	Refer to HRA of Sub-regional apportionment
Elan Valley Woodlands	Transport-related air pollution	Transport-related air pollution				Rural renaissance in West Midlands unlikely to be the main driver of further increases in air pollution affecting this site.
Ensor's Pool				Implications for supporting habitat		
Fenn's Wixhall, Bettisfield, Wem and Cadney Mosses	Transport-related air pollution	Possible increases in visitors and associated disturbance, transport-related air pollution				Rural renaissance in West Midlands unlikely to be the main driver of further increases in air pollution affecting this site.
Fens Pool				Implications for supporting habitat		
Humber Estuary						
Lyppard Grange Ponds				Possible effects but not considered likely to be significant		
Montgomery Canal SAC		Possible increase in sporting and recreational use.				Site-based solutions should be possible but consider proximity to environmental limits in terms of visitor numbers.
Mottey Meadows				Isolated site possibly affected by land use change in surrounding areas (pollution, disturbance, physical damage)		
Pasturefields Salt Marsh			Maintenance of characteristic flooding regime is important, and avoidance of polluted			Policy on flood risk management expected to be included in Phase 2 Revision

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

			surface water flooding			
Peak District Dales	Transport-related air pollution (NB there is a relatively high proportion of the site's total land area within 200 m of a road).	Possible increases in visitors and associated disturbance, physical damage, transport-related air pollution.	Possible impacts associated with development of renewable energy,			Possible impacts associated with development of renewable energy, including in combination effects of development promoted in other RSSs. Targets not finalised at this stage so further assessment needed. Further work also needed on air pollution impact associated with transport due to increases in population, housing, economic growth and tourism.
Rhos Goch SAC		Possible in combination effects due to promotion of tourism in Wales, the West Midlands.				Possible in combination effects due to levels of development in neighbouring regions.
River Clun						
River Dee and Bala Lake		Possible in combination effects due to promotion of tourism in Wales, the West Midlands and the North West.				Possible in combination effects due to levels of development in neighbouring regions.
River Mease			Protection of agricultural land could affect intensity of land use in the catchment.		Possible impacts from minerals extraction in the floodplain.	Policies related to protection of agricultural land (site affected by polluted run-off and eutrophication).
River Usk		Possible increases in visitor pressure but policies in West Midlands unlikely to be the main driver.				
River Wye		Impacts associated largely with water-based sport and recreation.	Protection of agricultural land could affect intensity of land use in the catchment.		Possible impacts from minerals extraction in the floodplain.	Consider need for establishment of thresholds or mitigation required to accommodate increasing levels of use for sport and recreation.
Severn Estuary					Possible impacts from minerals extraction in the floodplain.	Possible impacts associated with development of renewable energy and also aggregate extraction, though West

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

						Midlands not main driver for demand.
South Pennine Moors	Transport-related air pollution.	Possible increases in visitors and associated disturbance, physical damage, transport-related air pollution.				Possible impacts associated with development of renewable as well as ongoing issues associated with air pollution (Phase 3 is not the main driver for this).
The Stiperstones and the Holley	Transport-related air pollution.	Possible increases in visitors and associated disturbance, transport-related air pollution.				Phase 3 is not the main driver for these impacts.
West Midlands Mosses	Transport-related air pollution.					Phase 3 is not the main driver for these impacts.
Wye Valley and Forest of Dean bat sites			Biodiversity policies likely to benefit site in terms of consolidation of supporting habitat, creation of ecological networks.			Biodiversity policies likely to benefit site in terms of consolidation of supporting habitat, creation of ecological networks but further work required to strengthen policies so that they do influence outcomes on the ground.
Wye Valley Woodlands		Possible increases in visitors and associated disturbance, transport-related air pollution.				Biodiversity policies and policies promoting forestry and woodlands likely to benefit site in terms of consolidation of supporting habitat, creation of ecological networks.
SPAs						
Humber Estuary						
Peak District Moors (South Pennine Moors Phase 1)	Transport-related air pollution.	Possible increases in visitors and associated disturbance, transport-related air pollution.				
Severn Estuary			Flood risk management throughout region has implications for Severn Estuary, largely in terms of sediment supply,			

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

			flooding regime.			
South Pennine Moors Phase 2	Transport-related air pollution.	Possible increases in visitors and associated disturbance, transport-related air pollution.				Possible impacts associated with development of renewable energy, which will require further consideration when targets are issues. Ongoing issues associated with air pollution and impacts of tourism and recreational use.
Walmore Common						
Ramsar Sites						
Humber Estuary						
Midlands Meres and Mosses Phases 1 and 2						
KEY:		Impact unlikely to be significant. Phase 3 policy recommendations not the main source of impact				Could be significant and requires further consideration before policies are finalised in the new RS

9 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 Spreadsheet² 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 network³.

There are several sites in the plan area which could be exposed to adverse effects from increased emissions of atmospheric pollutants associated with implementation of Phase Three policies. It is difficult to predict the precise nature or level of changes in air emissions associated with development. Increases in emissions due to housing development and likely increases in levels of traffic/ transport by car are potentially offset by the following factors:

- Power stations for domestic supply are becoming more efficient.
- Vehicles are also becoming more efficient, so although traffic volumes are expected to increase, emissions per vehicle may decrease over time.
- Increased emissions do not necessarily translate into increased levels of deposition where designated plant communities are located and it is difficult to predict actual levels of deposition.

Nevertheless there are several sites supporting designated interest features (largely vegetation communities) which are known to be sensitive to air pollution and some of these sites are already over their critical loads for some pollutants. We have used the APIS database (www.apis.ac.uk) to identify such sites and to clarify likely risks of adverse effects on their integrity as a result of any possible increases in air emissions. Specific assessments have been carried out to identify those European sites which have any part of their designated area within 200m of a major road on which levels of traffic could potentially increase as a result of the Core Strategy as it is important to identify European sites for which further pollution might result in a critical load being reached or further exceeded so that appropriate mitigation measures can be identified.

APIS has been updated with the addition of Site Relevant Critical Loads and a Source Apportionment for the UK Natura 2000 network⁴. 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.

Critical Loads are defined as “the threshold level for the deposition of a pollutant above which harmful indirect effects can be shown on a habitat or species, according to current knowledge”. It is important to distinguish between a critical load and a critical level. The critical load relates to the quantity of pollutant deposited from air to the ground, whereas the critical level is the gaseous concentration of a pollutant in the air. For terrestrial

² 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.

³ 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

⁴ 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

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

ecosystems APIS has used typical biological criteria based on no adverse effect on growth, soil stability, and groundwater quality to define critical loads and levels.

The table below summarises the extent to which sensitive sites are over their critical loads for Nitrogen deposition and acidification.

WMRSS Phase 3 Policy Recommendations: Implications for European Sites

Table 9 – 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 sensitive 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

WMRSS Phase 3 Policy Recommendations: Implications for 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
	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.

WMRSS Phase 3 Policy Recommendations: Implications for 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
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

WMRSS Phase 3 Policy Recommendations: Implications for 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
		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

WMRSS Phase 3 Policy Recommendations: Implications for 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
	Tilio-Acerion forests of slopes, screes and ravines (H9180)	Yes	Yes – exceeds upper bound levels	Yes	Yes – exceeds upper bound levels
	<i>Austropotamobius pallipes</i> (S1092). White-clawed (or Atlantic stream) crayfish	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.			
	<i>Lampetra planeri</i> (S1096) (Brook lamprey)	Nutrient nitrogen - Decision to be taken at a site specific level since habitat sensitivity depends on N or P limitation.			
	<i>Cottus gobio</i> (S1163)				
South Pennine Moors SAC	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
	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

WMRSS Phase 3 Policy Recommendations: Implications for 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
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.			

WMRSS Phase 3 Policy Recommendations: Implications for 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
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