

DRAFT SCREENING REPORT
Habitat Regulations Assessment (HRA)
For
Coventry Local Plan & City Centre Area
Action Plan
2016



A Report for Coventry City Council

January 2016

Produced by

Ecological Services
Warwickshire County Council
Barrack Street
Warwick
CV34 4TH
(01926 418060)

Report Version Control

Version	Date	Author	Checked By
V1.Draft	15.01.16	Louise Mapstone MCIEEM	David Lowe MCIEEM

Non-Technical Summary

A Stage 1 screening of the Habitat Regulations Assessment (HRA) process was undertaken of the Coventry Local Plan and Coventry City Area Action Plan between November 2015 and January 2016 by Ecology Services at Warwickshire County Council (WCC) on behalf of the Planning Policy Team, part of the Place Directorate at Coventry City Council (CCC).

The screening exercise is required under Article 6 (3) of the European Commission's Habitats Directive (92/43/EEC). The exercise was undertaken following best practice guidance, principally using the Habitat Regulations Assessment Handbook (2016) produced by David Tyldesley Associates.

The administrative boundary for Coventry City Council extends beyond the City Centre boundary to cover 'an area of 99km² located in central England, approximately 15km south east of Birmingham and approximately 10km north of Leamington Spa' (AFW 2015) (see Figure 1).

The key European Site that was selected for consideration as part of the study was Ensor's Pool Special Area of Conservation (SAC) in Nuneaton, Warwickshire. This is the only site within a 20km buffer zone around the administrative boundary of CCC. A 20km buffer zone was also used during a previous HRA of the 2012 Coventry Core Strategy Consultation Draft, undertaken by WCC in 2012 (WCC 2012).

A further four European Sites that lie close to the boundary of Warwickshire, but outside of the 20km buffer zone around CCC were considered and screened out of this HRA. Justification is provided in this report.

The potential for any impact of the Coventry Local Plan and City Centre Area Action Plan on hydrologically dependant Welsh SACs (should water to supply development in Coventry be sourced from Wales) was raised by Natural England to Warwickshire County Council in 2012 for the previous HRA. Further consultation on this issue was also undertaken with Severn Trent Water in November 2015, who confirmed that water for the development in Coventry would be sourced from local supplies and not Wales. Hence any impact to Welsh SACs as a result of the Coventry Local Plan and Coventry City AAP has also been screened out of this HRA.

Ensor's Pool SAC is designated for its population of white-clawed crayfish (*Austropotamobius pallipes*), and the key potential vulnerabilities from the plan are considered to be: pollution from surface water flooding, an increase in water levels and potential to introduce non-native species.

An initial consultation exercise has been undertaken with Natural England, the Environment Agency and Severn Trent Water. This draft report will be sent out to these bodies in addition and as part of a public consultation in January 2016.

The current draft of the CCC Coventry Local Plan and Coventry City Area Action Plan was subject to a screening assessment using the screening categories in the Habitat Regulations Handbook (HRA Handbook 2016). All of the policies in both the plans were screened out. Given no Likely Significant Effects (LSE) of the plans are anticipated, it is not considered necessary to undertake an In-combination Assessment as no cumulative effects are predicted (Foster and Langton High Court Judgment 2015¹). A short-fall in housing and employment land has been identified via the Objectively Assessed Need Assessment for Coventry that cannot be accommodated within the

¹ Foster and Langton v Forest of Dean District Council [2015] EWHC 2648 22nd September

administrative boundary of Coventry City Council through these plans. This will be delivered in the future through the duty to co-operate (DtC) with neighbouring districts and boroughs. The implications of any additional development of this nature will be incorporated into the individual local plans of the relevant neighbouring district or borough and will require their own separate HRA.

The next stage is to consult Natural England and the Environment Agency on the conclusions of this draft screening report. Provided consultees are in agreement that no LSE are anticipated either alone or in-combination, the Coventry Local Plan and Coventry City Area Action Plan can be authorised, and the final HRA report produced (including the completion of the template in Appendix 5).

Acknowledgements

We are grateful to Ben Wood of Warwickshire County Council for his help with the creation of the Geographical Information Systems (GIS) project. We also appreciate the pre-submission advice on this HRA provided to us by Natural England, the Environment Agency and Severn Trent Water.

Contents

Non-Technical Summary	3
Acknowledgements.....	4
Contents.....	5
List of Figures	7
List of Tables	7
Glossary of Acronyms	8
1. Introduction	9
1.1. Background and Report Aim.....	9
1.2. Habitats Regulation Assessments.....	14
2. Methodology.....	19
2.1. HRA Screening Guidance	19
2.2. Site Selection of European Sites	19
2.3. Limitations and Assumptions.....	19
3. The Screening Assessment.....	21
3.1. Scanning and Site Selection of European Sites for Consideration.....	21
3.2. Site Descriptions	23
3.2.1. Ensor’s Pool SAC.....	23
3.3. Key Information on European Sites for the HRA	24
3.4. Screening of SACs	28
3.4.1. Current Housing Figures.....	28
3.4.2. Scoping of SACs with potential to be impacted by the Coventry Local Plan and Coventry AAP	29
3.4.3. Potential Functional Pathways.....	34
3.5. Screening Assessment	37
3.5.1. Screening of the Coventry Local Plan and Coventry AAP.....	38
4. In-combination Assessment.....	39
5. Summary and Next Steps	40
6. References	41
Appendix 1: Key Consultation Responses.....	43
1.1. Natural England Correspondence.....	43
1.1.1. Correspondence from Antony Muller, Lead Adviser.....	43
1.1.2. Correspondence with Steph Jones, Adviser	47
1.2. Severn Trent Water Correspondence	50
1.3. Environment Agency Correspondence	55
Appendix 2: Summary of Former Detailed Conservation Objectives and Targets	60

Appendix 3: Flooding map and the River Mease Catchment map 61

Appendix 4: Results of the screening of policies in the Coventry Local Plan and Coventry City AAP .. 62

 4.1 Screening for Coventry Local Plan 62

 4.2 Screening of the Coventry City AAP..... 77

Appendix 5: Template for recording the conclusion of the Habitat Regulations Assessment 82

List of Figures

Figure 1: Coventry boundary and strategic site allocations 2015

Figure 2: Location of SACs within a 20km buffer zone around Coventry

Figure 3: How the HRA process influences decisions (HRA Handbook 2013)

Figure 4: Outline of the four-stage approach to HRA (HRA Handbook 2013)

Figure 5: Outline of screening steps for Stage 1 of an HRA (from HRA Handbook 2013)

Figure 6: Ten steps in the screening assessment of in-combination effects (from HRA Handbook 2013)

Figure 7: Proximity and flow of the Rivers Tame, Anker, Mease and Trent in relation to the River Mease Catchment and Coventry

Figure 8: Proximity of European Sites within the wider area around Coventry

Figure 9: Ensor's Pool SAC and surface water flooding predictions for 30 years and 200 years

Figure 10: River Mease catchment area

List of Tables

Table 1: Table used for scanning and site selection from HRA Handbook 2013

Table 2: Information required to undertake a HRA

Table 3: Current issues and threats to Ensor's Pool as per Natural England's latest SIPs (Natural England 2014b)

Table 4: Further scoping of European Sites to consider in the HRA of the Coventry Local Plan and Coventry City AAP

Table 5: Key functional pathways for potential LSE from the Coventry Local Plan and Coventry City AAP

Table 6: The HRAs Handbook 2015 screening categories

Table 7: Screening matrix for the Coventry Local Plan

Table 8: Screening matrix for the Coventry City AAP

Glossary of Acronyms

AA	Appropriate Assessment
AAP	Area Action Plan
AFW	Amec Foster Wheeler
APIS	Air Pollution Information System
CCC	Coventry City Council
CIEEM	Chartered Institute of Ecology and Environmental Management
DMRB	Design Manual for Roads and Bridges
DTA	David Tyldesley Associates (Publishing)
DtC	Duty to Cooperate
EA	Environment Agency
ECJ	European Court Judgement
GIS	Geographical Information Systems
GQA	General Quality Assessment
HCl/ HF	Halogens
HiMO	Homes in Multiple Occupation
HRA	Habitat Regulations Assessment
HS2	High Speed Rail 2
IROIT	Imperative Reasons of Overriding Interest Test
JNCC	Joint Nature Conservancy Council
LSE	Likely Significant Effect
MCIEEM	Full Member of the Chartered Institute of Ecology and Environmental Management
N2K	Natura 2000 / European Sites
NO _x	Nitrogen Oxides
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Need
OLDSIS	Operations Likely to Damage the Special Interest of the Site
QGIS	Quantum Geographic Information System
PAH	Polycyclic Aromatic Hydrocarbons
PINS	The Planning Inspectorate
PM	Particulates
SA	Sustainability Appraisal
SACs	Special Areas of Conservation
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment
SIP	Site Improvement Plan
SPAs	Special Protection Areas
SNH	Scottish Natural Heritage
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Urban Drainage Systems
SUE	Sustainable Urban Extension
VOC	Volatile Organic Compounds
WCC	Warwickshire County Council
WCML	West Coast Main Line

1. Introduction

1.1. Background and Report Aim

Ecology Services at Warwickshire County Council (WCC) were commissioned by the Planning Policy Team at Coventry City Council (CCC) in November 2015 to undertake a 'Habitat Regulations Assessment' (HRA) of the current draft of the 'Coventry Local Plan' (CCC 2016a) and Coventry City Area Action Plan (AAP) (CCC 2016b) (both provided to Ecology Services on 05.11.15 and updated version on 07.01.16).

The Coventry Local Plan covers the entire administrative boundary for Coventry City Council. The remit extends beyond the City Centre boundary to cover *'an area of 99km² located in central England, approximately 15km south east of Birmingham and approximately 10km north of Leamington Spa'* (AFW 2015). The remit of the plan is provided in Figure 1. The aim of the Coventry Local Plan is to outline the nature and remit of proposed development in the entire administrative boundary for Coventry City Council between 2011 and 2031.

Coventry has seen a historical population decline in the 80s, 90s and early 00s but is now growing again and this year was *'identified as the fastest growing city in England outside of London'* (CCC 2016a). Current predictions project Coventry's population *'to grow by in excess of 89,000 people between 2011 and 2031'* with approximately 53% of these being of working age (CCC 2016a). This projected population growth has resulted in an Objectively Assessed Need (OAN) for 42 400 homes in addition to approximately 215ha of employment land and 106 000 m² of retail floor space (CCC 2016a). There is also an estimate of 12 000 (600 per annum) affordable homes *'which are to be provided as a proportion of total need and from within the existing housing stock'* (CCC 2016a). An updated Strategic Housing Land Availability Assessment (SHLAA) highlighted that the city can accommodate between 24 600 and 25 000 homes. Policy DS1 outlines Coventry's 'Overall Development Needs' as follows:

- 24 600 additional homes
- 128ha of employment land including:
 - At least 176 000 m² of office space at Friargate and the wider city centre
 - Continued expansion of Whitley Business Park
 - 15ha strategic allocation adjoining the A45 as part of the Eastern Green urban expansion
- 84 000 m² gross comparison retail floor space and 21 900 m² gross of convenience floor space by 2031, of which at least 72 000 m² will be allocated to Coventry City Centre

The policy also states that Coventry's objectively assessed housing need is 42 400 additional homes and 369ha of employment land for the period of 2011 to 2031. However *'it is not possible to deliver all of this additional development land within the city boundary'*, hence CCC *'will continue to work actively with neighbouring Councils through the Duty to Co-operate to ensure that appropriate provision is made elsewhere within the Housing Market Area'* (CCC 2016a).

The Coventry Local Plan comprises a total of 13 Sections as follows:

- Section 1: Overall Growth and the Duty to Cooperate
- Section 2: Health and Wellbeing
- Section 3: Jobs and Economy
- Section 4: Housing

- Section 5: Retail and Town Centre Uses
- Section 6: Communities
- Section 7: Green Belt and Green Environment
- Section 8: Design
- Section 9: Heritage
- Section 10: Accessibility
- Section 11: Environmental Management
- Section 12: Connectivity
- Section 13: Infrastructure Implementation and Monitoring

A map outlining the key strategic sites for the Coventry Local Plan 2016 including current housing, employment and mixed use allocations in the context of the nearest European Site is provided in Figure 1. The location of Special Areas of Conservation (SAC) within a 20km buffer zone around Coventry is provided in Figure 2.

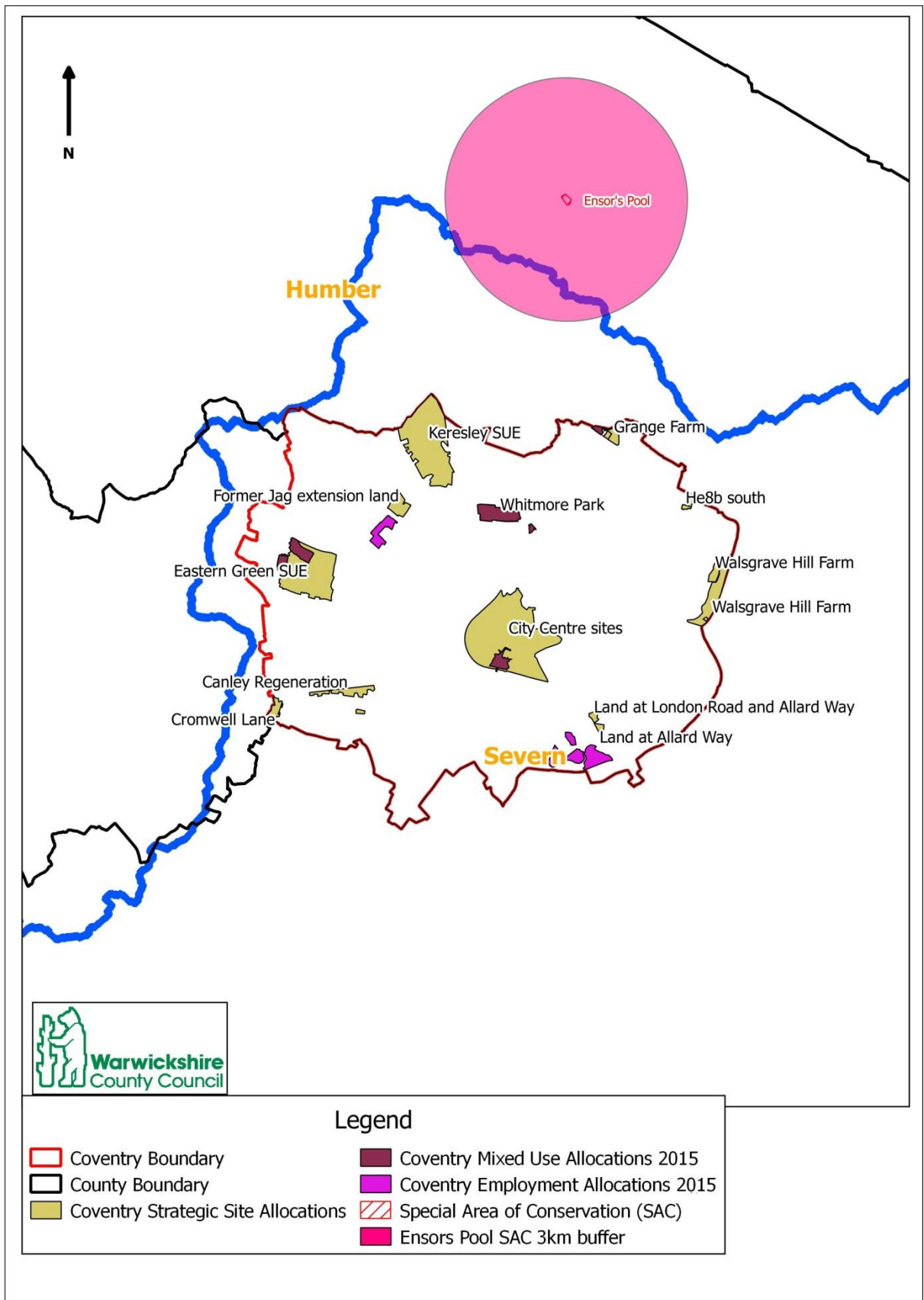


Figure 1: Coventry boundary and strategic site allocations 2015

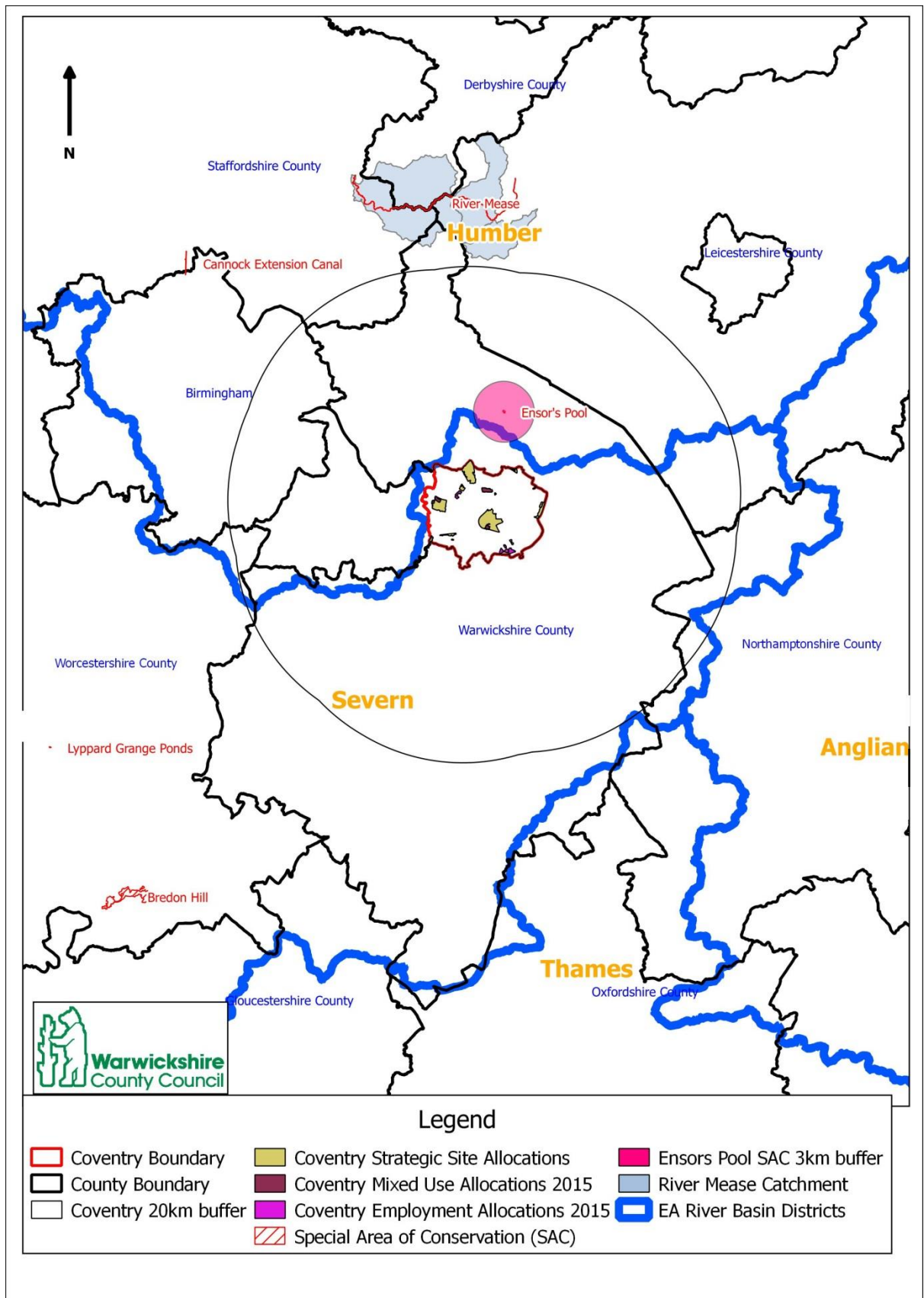


Figure 2: Location of SACs within a 20km buffer zone around Coventry

Separate to the Coventry Local Plan is the CCC 'City Centre Area Plan – Proposed Publication Draft' dated January 2016. The Area Action Plan (AAP) aims to 'help guide, inform and consider

development proposals within Coventry City Centre. This Area Action Plan will sit alongside the Council's new Local Plan but will provide greater detail and build up the policy basis provided in that document' (CCC 2016b). The AAP contains 26 policies which have also been screened as part of this HRA (see Section 3.5 and Appendix 4).

This HRA also makes reference to a former HRA assessment of an earlier draft of the Coventry Local Plan (the 'Core Strategy Consultation Draft dated 31st July 2012') in 2012 (WCC 2012). In this plan, predicted housing levels were considerably lower, comprising a minimum of 11 373 new dwellings between 2011 and 2028 compared to the current figure of 24 600 between 2011 and 2031. This equates to an extra 561 houses per year.

An initial screening assessment was undertaken between November 2015 and January 2016 of the policies in the current Coventry Local Plan (dated January 2016) and Coventry AAP (dated January 2016). This exercise allowed the consideration of if the plans, or policies within the plan could have a 'likely significant effect' (LSE) (as defined in Article 6(3) of the Habitats Directive and subsequent case law), '*either individually or in combination with other plans and projects*' on the integrity of any European Sites of nature conservation importance (i.e. Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites). The HRA screening report will be put out for public consultation in January 2016 alongside the Coventry Local Plan and the Coventry AAP.

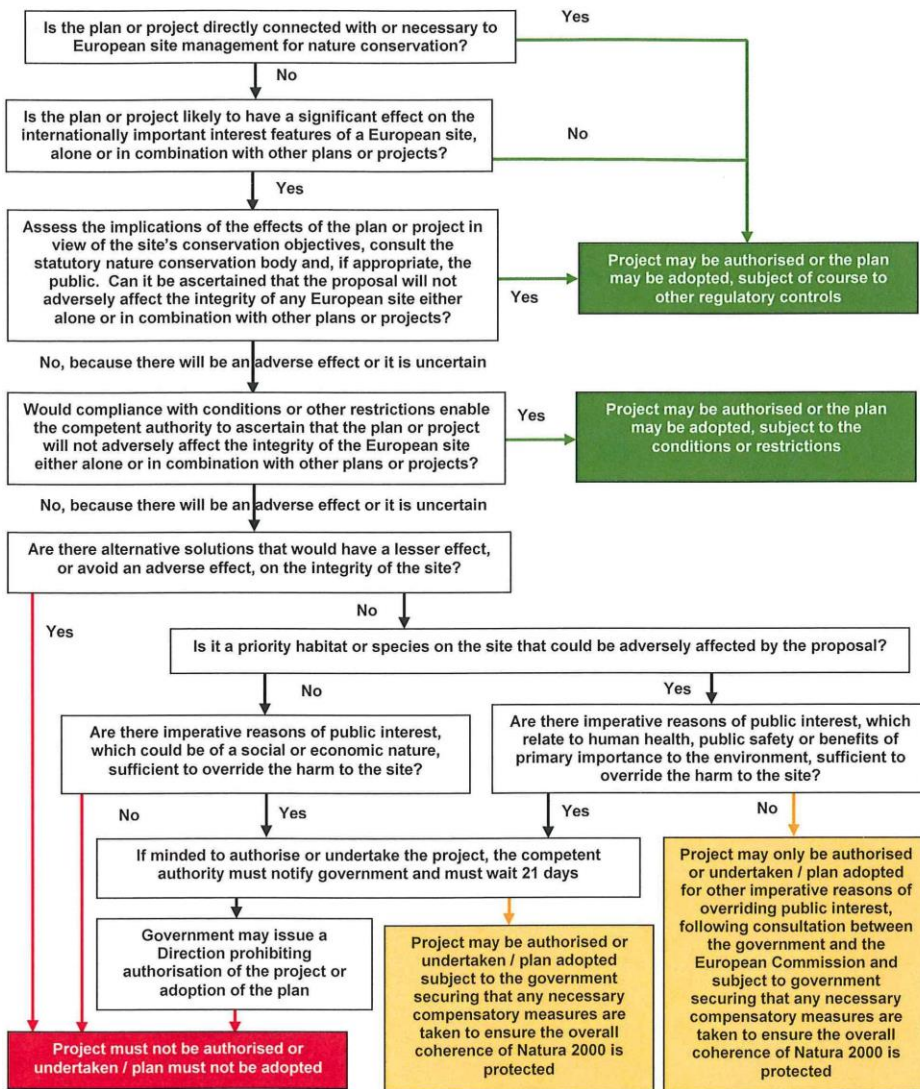
As highlighted in the Planning Inspectorate's Guidance Note on HRA (August 2013), '*HRA is an iterative process and the emphasis should be on avoiding likely significant effects (LSE)*' (hereafter known as the PINS Advice Note 10).

The interpretation of a LSE, is set out in case law and guidance. The Habitats Directive highlights that an Appropriate Assessment should be triggered if any plan or project could have a LSE either '*individually or in combination with other plans or projects*'. In the European Court Judgement (ECJ) Ruling C-127/02, Waddenzee, the Habitat Regulations Assessment Handbook (DTA 2016, hereafter known as the HRA Handbook 2016), states that '*irrespective of the normal English meaning of 'likely', in this statutory context 'a likely significant effect' is a 'possible significant effect'; one whose occurrence cannot be excluded on the basis of objective information*'. The HRA Handbook 2015 continues that '*However, to be excluded on the basis of objective information, the probability of a significant effect does not necessarily have to be zero. An effect could be excluded from assessment if the risk of it occurring would be an extremely low probability indeed for example, a risk of 1 in 0.5 million per year.*' '*A significant effect is any effect that would undermine the conservation objectives for a European site. **There must be a causal connection or link between the subject plan or project and the qualifying features of the site which could result in possible significant effects on the site.** These effects may be direct or indirect and the existence and scope of possible effects must be judged on a case-by-case basis*'.

If a LSE is anticipated from any aspect of the plan or in-combination with other plans and projects, then a more detailed Appropriate Assessment (AA) will be required to be undertaken with the appropriate consideration of mitigation measures and alternative solutions prior to any decision to adopt the plan. This further work if required will be '*carried forward in a focussed and tightly scoped AA*' (PINS Advice Note 10).

Figure 3 below from the HRA Handbook outlines '*How the Habitats Regulations Assessment process influences decisions*'.

How the Habitats Regulations Assessment process influences decisions



Extract from *The Habitats Regulations Assessment Handbook*, www.dtapublications.co.uk
 © DTA Publications Limited (September) 2013 all rights reserved
 This work is registered with the UK Copyright Service

Figure 3: How the HRA process influences decisions (HRA Handbook 2013)

1.2. Habitats Regulation Assessments

HRAs are required under Article 6 of the European Habitats Directive (92/43/EEC on the conservation of natural habitats and of wild fauna and flora). Article 6 also covers the requirements for HRA under the Birds Directive (on conservation of wild birds 79/409/EC, now codified directive 2009/147/EC) to the effect that only one assessment is required for all European Sites (also known as Natura 2000 sites or N2K sites) covered by both directives.

Paragraphs 109, 113, 118 and 119 of the National Planning Policy Framework (NPPF) are relevant to HRAs. Specifically, paragraph 118 states that any '*sites identified, or required as compensatory measures for adverse effects on European sites, potential SPAs, possible SACs and listed or proposed Ramsar sites... should be given the same protection as European sites*'.

Article 6 (1) and 6 (2) of the Habitats Directive 92/43/EEC set out the obligations of Member States on European Sites:

Article 6 (1)

'For special areas of conservation, Member States shall establish the necessary conservation measures involving, if need be, appropriate management plans specifically designed for the sites or integrated into other development plans, and appropriate statutory, administrative or contractual measures which correspond to the ecological requirements of the natural habitat types in Annex I and the species in Annex II present on the sites'.

Article 6 (2)

'Member States shall take appropriate steps to avoid, in the special areas of conservation, the deterioration of natural habitats and the habitats of species as well as disturbance of the species for which the areas have been designated, in so far as such disturbance could be significant in relation to the objectives of this Directive'.

Article 6 (3) outlines when an HRA should be undertaken:

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having obtained the opinion of the general public.'

Article 6 (4) discusses alternative solutions and the Imperative Reasons of Overriding Interest Test (IROIT)

'If, in spite of a negative assessment of the implications for the site 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 a 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.

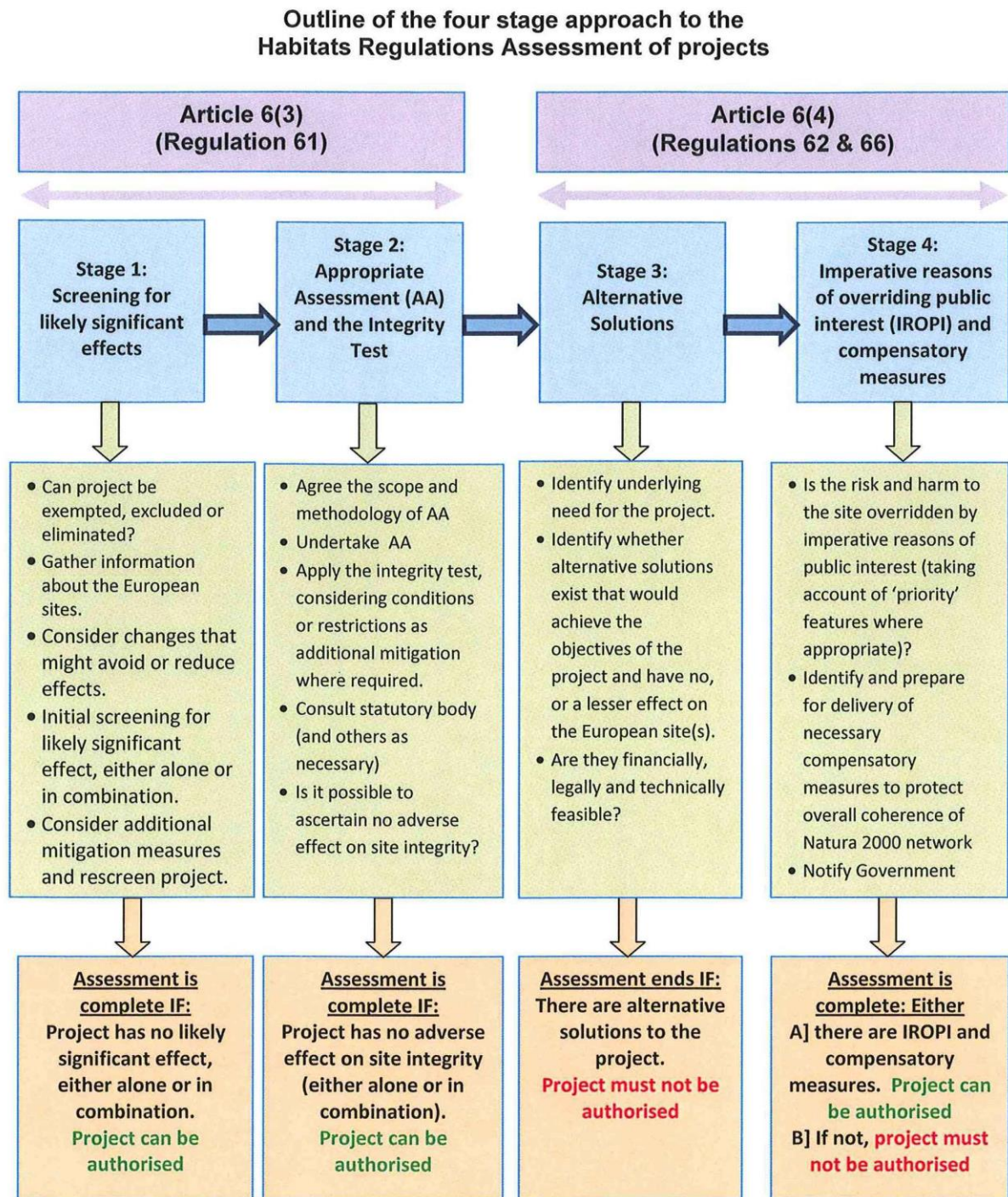
Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest'.

In England, all European Sites are designated by Defra and will have at least one 'qualifying feature' (either a habitat, species or both) to be designated as European Sites. These designations are underpinned by the national level designation of Sites of Special Scientific Interest (SSSI). SSSI designations cover broader conservation issues than just the qualifying features of a European Site and can have different site boundaries.

A HRA deals only with negative effects on the qualifying features of European Sites. This HRA deals only with SACs, as there are no SPAs or Ramsars within a reasonable proximity (20km, see Figure 2) to Coventry that could be impacted by Coventry Local Plan or Coventry City Area Action Plan. The SSSI data for the European Sites selected, in addition to direct consultation with Natural England has been used in order to determine the current conservation status and condition assessment of the selected European Sites.

The HRA for the Coventry Local Plan and Coventry City AAP comes under the remit of Regulations 102 to 105 of the Conservation of Habitats and Species Regulations 2010 (as amended).

The HRA Handbook 2016 and other guidance, divides the HRA process into four distinct stages. This is illustrated in Figure 4 below.

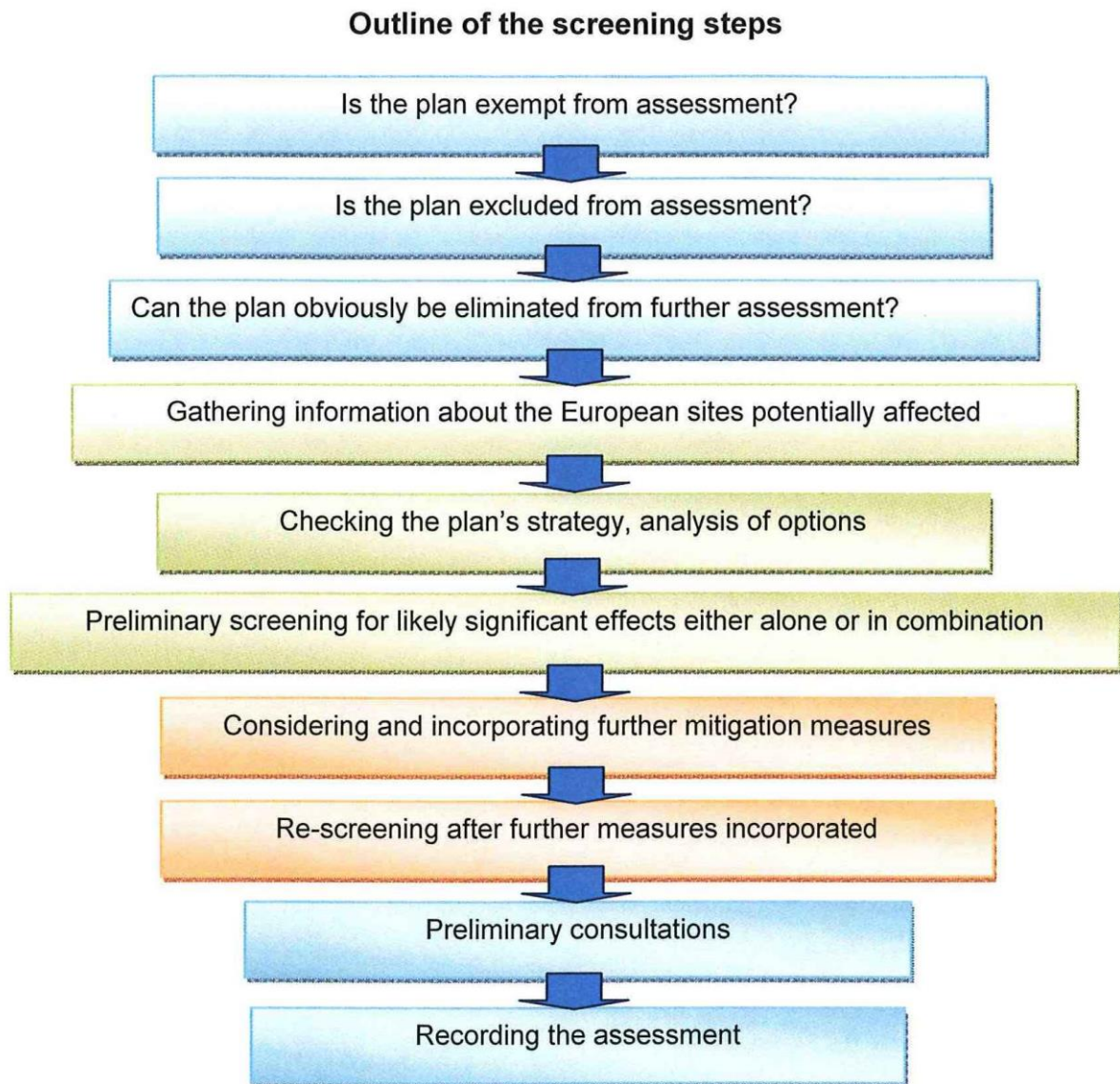


Extract from *The Habitats Regulations Assessment Handbook*, www.dtapublications.co.uk
 © DTA Publications Limited (September) 2013 all rights reserved
 This work is registered with the UK Copyright Service

Figure 4: Outline of the four-stage approach to HRA (HRA Handbook 2013)

This report relates only to Stage 1 of the process which involves the screening for any LSE to ascertain if an AA will be triggered. The HRA Handbook 2016 confirms that if appropriate mitigation measures can be incorporated into the plan or project at this screening stage (known as 'incorporated mitigation measures'), that result in no LSE when the plan is re-screened with

these new measures an AA will not be required. Figure 5 below highlights the steps in Stage 1 screening for LSE covered in this report.



Extract from *The Habitats Regulations Assessment Handbook*, www.dtapublications.co.uk

© DTA Publications Limited (September) 2013 all rights reserved

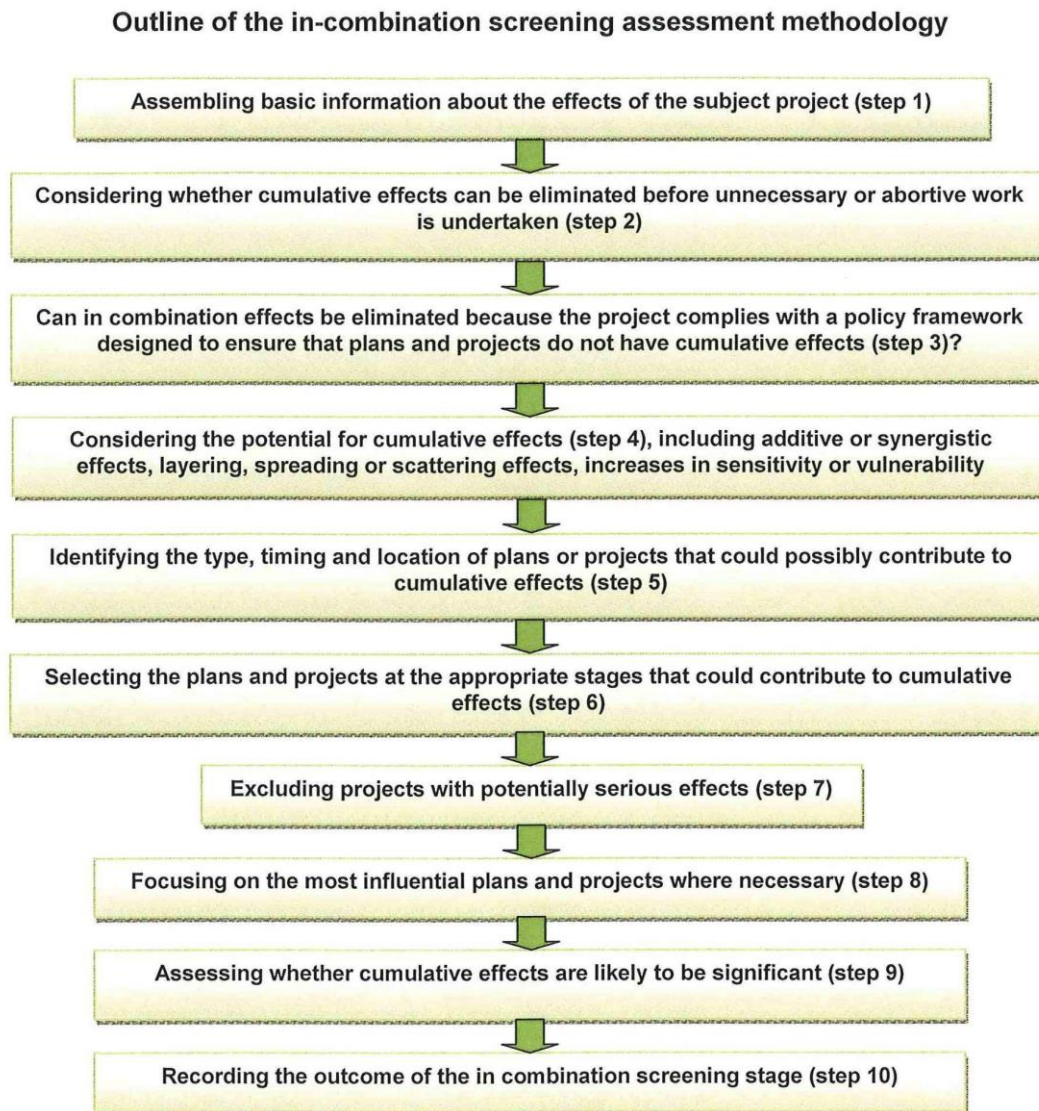
This work is registered with the UK Copyright Service

Figure 5: Outline of screening steps for Stage 1 of an HRA (from HRA Handbook 2013)

An In-combination Assessment of other plans and projects in the area is also required as part of the HRA process at both the screening and AA stage. As stated in the draft 2013 Habitat Regulations Assessment Guidance produced by Defra and highlighted in the HRA handbook 2016 *'the effects of a plan or project must be considered both individually and in-combination with other relevant plans and projects. This is a requirement of the Habitats Directive which helps ensure that European Sites are not damaged by the additive effects of multiple plans or projects'*. As with the screening of the Coventry Local Plan and Coventry AAP, the HRA also needs to ensure that any potential impacts from other plans or projects in the area on a European Site (that could increase the impacts already identified for either the Coventry Local Plan or the

Coventry AAP on a cumulative basis) are identified and measures are put in place to protect European Sites from these cumulative effects.

Figure 6 below outlines the ten steps in the In-combination Screening Assessment methodology as stated in the HRA handbook 2016.



Extract from *The Habitats Regulations Assessment Handbook*, www.dtapublications.co.uk
© DTA Publications Limited (September) 2013 all rights reserved
This work is registered with the UK Copyright Service

Figure 6: Ten steps in the screening assessment of in-combination effects (from HRA Handbook 2013)

Following the screening exercise undertaken, it was considered that an In-combination Assessment was not required, as cumulative effects were eliminated. This follows advice in the HRA handbook (see step 3 in Figure 6 above). Further details are provided in Section 4.

2. Methodology

2.1. HRA Screening Guidance

The methodology used for the screening of the Coventry Local Plan (dated January 2016) and Coventry AAP (dated January 2016) is primarily based on the recommendations outlined in The Habitat Regulations Assessment Handbook 2016 by DTA publishing. Key guidance used in this screening assessment is highlighted below and in Section 6.

- The HRA Handbook 2016 to which Warwickshire County Council is a current subscriber. The screening categories used in Table 6, Section 3.5 are directly from the handbook;
- The PINS Advice Note 10 in August 2013 (Version 5); and
- Scottish Natural Heritage (SNH) Habitats Regulations Appraisal of Plans. Guidance for Plan-Making Bodies in Scotland (Version 2.0) August 2012 (hereafter, known as the SNH guidance).

Reference is also made to Warwickshire's HRA of the Coventry Core Strategy Consultation Draft dated July 2012 (WCC 2012) and the Coventry City Council 'Coventry Water Cycle Study' Dated 3 November 2015 produced by Amec Foster Wheeler (AFW 2015).

2.2. Site Selection of European Sites

Table 1 in Section 3.1 (from the HRA Handbook), was used to help select which European Sites to consider at the screening stage. Information required for assessment on each European Site selected was obtained from Natural England's website and through direct consultation.

Initial consultation was also undertaken with the Environment Agency (20.11.15 & 23.12.15), Natural England (10.11.15, 13.11.15, 02.12.15 & 04.12.15) and Severn Trent (13.11.15, 24.11.15, 26.11.15) by email. These authorities were consulted on the scope of the assessment and the nature of any other plans and projects that would need to be considered as part of any In-combination Assessment. Further information on the current situation regarding the conservation status of Ensor's Pool SAC was also obtained.

The consultation responses from Natural England, Environment Agency and Severn Trent Water are provided in Appendix 1.

A Quantum Geographical Information Systems (QGIS) project has been developed to help scope and refine the screening exercise for this HRA and enabled the production of all maps within this report (see Figures 1, 2, 7 & 8).

2.3. Limitations and Assumptions

This HRA is based on the latest available information on the European Sites selected, provided by Natural England at the time of writing. It is likely that in the future, the conservation status, objectives and condition of European Sites may change. Natural England is also developing new and more detailed Conservation Objectives but these are not available at the time of writing. Future HRAs will need to use this new information, as it becomes available.

In March 2015, the Ribble case in the UK courts² has suggested the need to consider older more detailed Conservation Objectives for European Sites which are currently not published on

² RSPB v Secretary of State for the Environment Food and Rural Affairs, BAE Systems (Operations) Ltd and Natural England, 18th March 2015, [2015] EWHC Civ 227, referred to as the *Ribble* Case.

Natural England's website. We have obtained the 2008 Conservation Objectives for Ensor's Pool SSSI from Natural England. These are summarised in Appendix 2 of this report.

In a previous HRA undertaken for WCC for the forthcoming Warwickshire Minerals Plan, we received correspondence from Natural England in August 2015 (extract provided in Appendix 1, Section 1.1). This stated that our 'primary focus' should be on the European Site Conservation Objectives for the relevant European Site these are all provided in Table 2 of this report.

It should also be noted that in September 2014, surveys for the population of white-clawed crayfish at the only European Site in Warwickshire (Ensor's Pool SAC), did not locate any white-clawed crayfish. The surveyor's report, published by Natural England in October 2015 states the survey in September 2014 indicates the *'once abundant population of white-clawed crayfish appears to have disappeared. The pool still appears to provides suitable habitat for crayfish and there is no indication that any other animal or plant species has been affected.'* The report goes on to suggest that crayfish plague *'seems likely to be the cause of mortality'* and recommends further surveys *'to verify the absence of white-clawed crayfish and determine whether signal crayfish are present'* (Natural England 2015).

Subsequent further surveys were undertaken in 2015, comprising a bioassay between June and September and a trapping survey in September. Natural England confirmed to Ecology Services at Warwickshire County Council on 02.12.15 that *'We conclude that the population of native white-clawed crayfish is no longer present at Ensor's Pool. Natural England is now considering these results and their implications in conjunction with our national specialists and the ecologists who undertook the surveys'* (see correspondence from Antony Muller in Section 1.1.1, Appendix 1).

Ecology Services at Warwickshire County Council also received correspondence from Natural England on 03.07.15 and 14.01.15 in relation to the current designation of Ensor's Pool SAC / SSSI given the results of the above surveys. On 03.07.15 Natural England confirmed that Habitat Regulations Assessment (HRA) of plans and projects with the potential to affect the site should therefore be carried out on a 'business as usual' basis. An email received from Natural England on 02.12.15 specifically relating to this HRA of the Coventry Local Plan, confirmed no change to this previous advice.

The European Site selection for this HRA is based on the most recent GIS data available at Warwickshire County Council and provided by the planning policy team in the Place Directorate at Coventry City Council. The Coventry Local Plan and Coventry AAP are at an iterative stage and will go out to public consultation in January 2016. Hence any further proposed changes in the plan and policies within it will need to be checked for LSE to European Sites.

3. The Screening Assessment

3.1. Scanning and Site Selection of European Sites for Consideration

Only one European Site, Ensor's Pool SAC, was noted to be within a 20km buffer zone of the administrative area of Coventry City Council (see Figure 2).

Figure 2 also shows a further four European Sites outside the 20km buffer zone. These are: Bredon Hill, Worcestershire; Cannock Extension Canal, Staffordshire; Lyppard Grange Ponds, Worcestershire; and the River Mease in Derbyshire, Leicestershire and Staffordshire. Further details of why these SACs have been scoped out are provided in Table 4 in Section 3.4.2.

During consultation with Natural England in 2012 in relation to a former draft of the Coventry Core Strategy, the potential sourcing of water from Wales to supply new development in Coventry was highlighted as having a potential negative impact on hydrologically sensitive Welsh SACs (e.g. rivers etc.). Details of more recent consultations with Severn Trent Water and why these European Sites have now been screened out of this HRA are provided in Section 3.4.2.

Table 2 below from the HRA Handbook 2015 has also been used to aid the selection process.

Scanning and site selection list for sites that could potentially be affected by the plan

Types of plan	Sites to scan for and check	Names of sites selected
1. All plans (terrestrial, coastal and marine)	Sites within the geographic area covered by or intended to be relevant to the plan.	Sites within 20km zone of Coventry: Ensor's Pool
2. Plans that could affect the aquatic environment	Sites upstream or downstream of the plan area in the case of river or estuary sites	River Mease Welsh SACs
	Open water, peat land, fen, marsh and other wetland sites with relevant hydrological links to land within the plan area, irrespective of distance from the plan area	None
3. Plans that could affect the marine environment	Sites that could be affected by changes in water quality, currents or flows; or effects on the inter-tidal or sub-tidal areas or the sea bed, or marine species	N/A
4. Plans that could affect the coast	Sites in the same coastal 'cell', or part of the same coastal ecosystem, or where there are interrelationships with or between different physical coastal processes	N/A
5. Plans that could affect mobile species	Sites whose qualifying features include mobile species which may be affected by the plan irrespective of the location of the plan's proposals or whether the species would be in or out of the site when they might be affected	River Mease Ensor's Pool
6. Plans that could increase recreational pressure on European sites potentially vulnerable or sensitive to such pressure	Such European sites in the plan area	N/A
	Such European sites within an agreed zone of influence or other reasonable and evidence-based travel distance of the plan area boundaries that may be affected by local recreational or other visitor pressure from within the plan area	N/A Ensor's Pool is not considered to be a 'tourist attraction' and the River Mease is too far from Coventry to be included in this category
	Such European sites within an agreed zone of influence or other evidence-based longer travel	N/A (see above)

	distance of the plan area, which are major (regional or national) visitor attractions such as European sites which are National Nature Reserves where public visiting is promoted, sites in National Parks, coastal sites and sites in other major tourist or visitor destinations	
7. Plans that would increase the amount of development	Sites in the plan area or beyond that are used for, or could be affected by, water abstraction irrespective of distance from the plan area	Ensor's Pool – yes has potential but site is over the EA 3km trigger threshold for hydrological impacts (see Figure 1 and Appendix 1.3), hence not considered an issue for the Coventry Local Plan
	Sites used for, or could be affected by, discharge of effluent from waste water treatment works or other waste management streams serving the plan area, irrespective of distance from the plan area	Ensor's Pool
	Sites that could be affected by the provision of new or extended transport or other infrastructure	N/A – no transport proposed outside of Coventry so this is screened out
	Sites that could be affected by increased deposition of air pollutants arising from the proposals, including emissions from significant increases in traffic	Ensor's Pool – potentially yes but considered too far away (See Table 5). River Mease – no distance too great.
8. Plans for linear developments or infrastructure	Sites within a specified distance from the centre line of the proposed route (or alternative routes), the distance may be varied for differing types of site / qualifying features and in the absence of established good practice standards, distance(s) to be agreed by the statutory nature conservation body	N/A no European Sites within Coventry
9. Plans that introduce new activities or new uses into the marine, coastal or terrestrial environment	Sites considered to have qualifying features potentially vulnerable or sensitive to the effects of the new activities proposed by the plan	N/A
10. Plans that could change the nature, area, extent, intensity, density, timing or scale of existing activities or uses	Sites considered to have qualifying features potentially vulnerable or sensitive to the effects of the changes to existing activities proposed by the plan	N/A
11. Plans that could change the quantity, quality, timing, treatment or mitigation of emissions or discharges to air, water or soil	Sites considered to have qualifying features potentially vulnerable or sensitive to the changes in emissions or discharges that could arise as a result of the plan	Ensor's Pool River Mease
12. Plans that could change the quantity, volume, timing,	Sites whose qualifying features include the biological resources which the plan may affect, or whose	N/A

rate, or other characteristics of biological resources harvested, extracted or consumed	qualifying features depend on the biological resources which the plan may affect, for example as prey species or supporting habitat or which may be disturbed by the harvesting, extraction or consumption	
13. Plans that could change the quantity, volume, timing, rate, or other characteristics of physical resources extracted or consumed	Sites whose qualifying features rely on the non-biological resources which the plan may affect, for example, as habitat or a physical environment on which habitat may develop or which may be disturbed by the extraction or consumption	N/A
14. Plans which could introduce or increase, or alter the timing, nature or location of disturbance to species	Sites whose qualifying features are considered to be potentially sensitive to disturbance, for example as a result of noise, activity or movement, or the presence of disturbing features that could be brought about by the plan	N/A – No European Sites located in Coventry.
15. Plans which could introduce or increase or change the timing, nature or location of light or noise pollution	Sites whose qualifying features are considered to be potentially sensitive to the effects of changes in light or noise that could be brought about by the plan	N/A – No European Sites located in Coventry
16. Plans which could introduce or increase a potential cause of mortality of species	Sites whose qualifying features are considered to be potentially sensitive to the source of new or increased mortality that could be brought about by the plan	<p>Ensor's Pool – changes in hydrology could impact this site but development lies outside the 3km buffer zone around Ensor's Pool provided by the Environment Agency (see Appendix 1.3)</p> <p>River Mease – not considered likely given distance from Coventry.</p>
<p>Extract from <i>The Habitats Regulations Assessment Handbook</i>, www.dtapublications.co.uk © DTA Publications Limited (September) 2013 all rights reserved This work is registered with the UK Copyright Service</p>		

Table 1: Table used for scanning and site selection from HRA Handbook 2013

There are no European Sites within Coventry itself. The nearest site is Ensor's Pool SAC that lies approximately 7.4km to the north-east of Coventry's boundary (see Figure 1).

3.2. Site Descriptions

The following section provides descriptions of Ensor's Pool using information sourced from Natural England, Joint Nature Conservancy Council (JNCC) and WCC 2010. Table 2 provides the following key information for each SAC:

- Qualifying features;
- Latest Conservation Objectives;
- Favourable conservation status; and
- Condition of features.

3.2.1. Ensor's Pool SAC

Ensor's Pool was formed from an abandoned clay pit around fifty years ago. It was notified as a SSSI in 1995, designated a Local Nature Reserve in 1997 and a SAC in April 2005. It is located on the south-west fringe of Nuneaton's urban area (grid reference SP348903) and covers an area of

approximately 3.8ha. It comprises an elongated (220m by 50m) isolated water body with an average depth of 8m. The pool is lined by an impervious layer of clay and therefore it is assumed that it is reliant on rainwater as the main supply of water. The Environment Agency has undertaken work to ascertain how the pool is fed and this has still not been quantified and remains an unknown factor.

Ensor's Pool is designated a European Site as it provides the habitat to one of the largest populations of healthy white-clawed crayfish (*Austropotamobius pallipes*) in England. The white-clawed crayfish flourished in both Britain and Europe until the commercial introduction of the signal crayfish (*Pacifastacus leniusculus*) from America in the 1970s. As well as preying on its smaller cousin, the signal crayfish carries a fungal disease to which the white-clawed crayfish has no immunity. Unfortunately, the signal crayfish and other non-native crayfish have since escaped the confines of the fisheries and entered the river systems of Britain and Europe, causing the dramatic decline of white-clawed crayfish. The isolation of Ensor's Pool from rivers creates a refuge for the white-clawed crayfish to flourish and that is why it is of both national and European importance.

In November 2014, Natural England reported that *'two recent surveys of Ensor's Pool in Warwickshire, noted for its populations of native white-clawed crayfish, have found no sign of the aquatic invertebrates'* (Natural England 2014a, press release 08.11.14, Natural England 2015). There is now a Natural England Site Improvement Plan (SIP) for Ensor's Pool where a key action is to *'further investigate the cause of the apparent collapse of the white-clawed crayfish population'* (See Table 4, Natural England 2014b). Given this finding, Ecology Services at WCC contacted Natural England for an official view on how Ensor's Pool should be considered for the purposes of this HRA.

An official response was provided in a letter dated 03.07.15 provided in Appendix 1, [Section 1.1](#) stated *'Natural England confirms there is no change to the SSSI/SAC designation. We advise that Habitats Regulations Assessment (HRA) of plans and projects with the potential to affect the site should therefore be carried out on a 'business as usual' basis.'* An email received from Natural England on 02.12.15 confirmed no change to this previous advice in relation to this HRA of Coventry Local Plan and Coventry City AAP (see Appendix 1).

3.3. Key Information on European Sites for the HRA

Table 2 below provides the latest information that is available via Natural England's website (as of December 2015) on the current Conservation Objectives, favourable conservation status and condition of features of Ensor's Pool SAC. Appendix 1 also provides consultation responses received from Natural England to date. The key vulnerability of Ensor's Pool SAC has been taken directly from the citation for the SAC. The relevant *'Operations Likely to Damage the Special Interest of the Site'* (OLDSIS) considered relevant to the Coventry Local Plan and Coventry AAP are listed in Table 2. Table 3 also highlights the current issues and threats to Ensor's Pool SAC as per the latest Natural England Site Improvement Plan (Natural England 2014b).

In addition to the current Conservation Objectives published by Natural England on their website, Ecology Services at Warwickshire County Council have also obtained the previous more detailed Conservation Objectives for Ensor's Pool SAC (dated 2008), which are also considered as part of this initial screening in line with recent HRA case law³. A summary of these more detailed Conservation Objectives and Targets are provided in Appendix 2 (Natural England 2008).

³ RSPB v Secretary of State for the Environment Food and Rural Affairs, BAE Systems (Operations) Ltd and Natural England, 18th March 2015, [2015] EWHC Civ 227, referred to as the *Ribble* Case.

Name, site reference and location	Designation status, area and date of designation	Qualifying features	Conservation objectives published by Natural England	General site character	Conservation status	Condition assessment	Key vulnerability / Operations Likely to Damage the Special Interest of the Site (OLDSIS) potentially relevant to the Coventry Local Plan
<p>Ensor's Pool, Warwickshire</p> <p>Grid reference: SP348903</p> <p>EU code: UK0012646</p> <p>Further information provided by Natural England via letter and emails dated 02.12.15, 03.07.15 & 14.01.15 (Appendix 1) and Natural England October 2015</p>	<p>SAC (Ensor's Pool SSSI)</p> <p>3.86 ha</p> <p>01.04.05</p>	<p>S1092: White-clawed crayfish <i>Austropotamobius pallipes</i></p>	<p>30th June 2014</p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:</p> <ul style="list-style-type: none"> • The extent and distribution of the habitats of qualifying species • The structure and function of the habitats of qualifying species • The supporting processes on which the habitats of qualifying species rely • The populations of qualifying species, and, 	<p>Inland water bodies (standing water, running water) (70%); Humid grassland. Mesophile grassland (30%)</p>	<p>In 2012 the population of white-clawed crayfish were found to be favourable at the site level as the population at the site 'remains at a reasonably high abundance' For current status see Appendix 2</p>	<p>2012 Condition Assessment of the single unit of the SSSI is described as favourable with 'no identified Condition Threat'. For current status see Appendix 2</p>	<p>Need to protect the site's water quality from direct or diffuse pollution.</p> <p>Avoid changing the amount of water in the pool (by abstracting water from inflowing streams or raising the water level).</p> <p>Avoid increasing the sediment.</p> <p>Avoid introduction of non-native species, especially non-native crayfish species.</p> <p>Avoid control or removal of natural aquatic vegetation</p>

			<ul style="list-style-type: none"> The distribution of qualifying species within the site. <p>Summary of Conservation Objectives from 2008 are provided in Appendix 3.</p>				<p>Avoid intentional or accidental introduction of species such as bottom feeding coarse fish</p> <p>OLDSIS: 14⁴</p>
--	--	--	---	--	--	--	--

Table 2: Information required to undertake a HRA.

⁴ OLDSIS 14: The changing of water levels and tables and water utilisation (including irrigation, storage and abstraction from existing water bodies and through boreholes).

In addition to the above key vulnerabilities the currently available SIP for Ensor’s Pool to be impacted by the Coventry Local Plan and Coventry City AAP are provided in Table 3 below. These outline the ‘*prioritised issues that are currently impacting or threatening the conditions of the features and the actions required to address them.*’ (Natural England 2014b)

Ensor’s Pool – Current Issues and Actions
<p><i>Changes in species distributions</i> - Historically Ensor’s Pool was a stronghold for the native white-clawed crayfish with a population estimate of around 50,000 animals. Surveys in September and October 2014 found no crayfish in the pool. Currently the cause of this decline is unknown and further investigations are currently taking place. The spread of crayfish plague is a key reason for decline of other populations.</p> <p>PROPOSED ACTIONS:</p> <ul style="list-style-type: none"> • Further investigate the cause of the apparent collapse of the white-clawed crayfish population. • Consider potential actions in response to the investigation.

Table 3: Current issues and threats to Ensor’s Pool as per Natural England’s latest SIPs (Natural England 2014b)

3.4. Screening of SACs

3.4.1. Current Housing Figures

An overview of the Coventry Local Plan and Coventry City AAP are provided in Section 1. Figure 1 illustrates the current proposed strategic sites associated with the Coventry Local Plan including known housing, employment and mixed use allocations.

The current figures for housing as provided in the Coventry Local Plan January 2016 for each site are as follows:

Site (Reference)	Total Dwellings	Site (Reference)	Total Dwellings	Site (Reference)	Total Dwellings
Keresley SUE (H2:1)	3100	Former Lyng Hall playing fields (H2:10)	185	Land at Mitchell Avenue (H2:19)	50
Eastern Green SUE (H2:2)	2250	Elms Farm (H2:11)	150	Land at Durbar Avenue (H2:20)	45
Walsgrave Hill Farm (H2:3)	900	Site of LTI Factory, Holyhead Road (H2:12)	110	Woodfield School site, Stoneleigh Road (H2:21)	30
Land at Whitmore Park, Holbrook Lane (H2:4)	730	Grange Farm (H2:13)	105	Land at the Junction of Jardine Crescent and Jobs Lane (H2:22)	25
Paragon Park (H2:5)	700	Former Transco Site, Abbots Lane (H2:14)	100	Land west of Cryfield Heights Gibbet Hill (H2:23)	20
Land at Browns Lane (H2:6)	475	Land at Sandy Lane (H2:15)	90	Land west of Cheltenham Croft (H2:24)	15
Land at Sutton Stop (H2:7)	285	Land at Carlton Road / Old Church Road (H2:16)	85	The Grange Children's Home, Waste Lane (H2:25)	15
Land west of Cromwell Lane (H2:8)	240	Nursery Sites, Browns Lane (H2:17)	80		
Land at London Road/Allard Way (H2:9)	200	Former Mercia sports field (H2:18)	75		

3.4.2. Scoping of SACs with potential to be impacted by the Coventry Local Plan and Coventry AAP

The SACs for consideration as part of this HRA have been further scoped and refined by an assessment exercise that has identified if there could be any causal connection or link between the different proposals and policies set out in the Coventry Local Plan and the Coventry AAP and the qualifying features and key vulnerabilities of Ensor's Pool SAC.

3.4.2.1 Ensor's Pool SAC

The site that has been screened in for further consideration in this HRA is:

- 1) **Ensor's Pool.** This site is vulnerable to:
 - Direct or diffuse pollution that could impact the water quality of the pool (particularly increases in sediment that not only change the water quality but also have a direct physical effect on white-clawed crayfish);
 - Any change in water levels. Figure 9 in Appendix 3 shows that Ensor's Pool lies within the surface water flooding zone for both 30 year and 200 year events;.
 - Introduction of non-native species, particularly non-native crayfish species;
 - Introduction of bottom feeding coarse fish;
 - Removal or control of natural aquatic vegetation; and
 - Physical disturbance to Ensor's Pool that could impact: the crayfish bankside refuges, the amount of bankside and marginal vegetation around the pool; the appropriate percentage of submerged macrophytes; and appropriate diversity of substrates within the pool.

Any proposed development under the Coventry Local Plan and Coventry City AAP that could lead to any of the above impacts on Ensor's Pool SAC would lead to the plans having a LSE on Ensor's Pool and trigger the need for a full AA of the Coventry Local Plan to be undertaken (see Stage 2 on Figure 4).

Any hydrogeological impacts to the pool from development within 2-3km of Ensor's Pool should be considered as recommended by the Environment Agency (see letter dated 16.09.15, in Appendix 1, Section 1.3). The Environment Agency in their initial consultation response to this HRA dated 23.12.15 (see Appendix 1, Section 1.3.) stated '*There is nothing planned in Coventry that can impact upon these designated sites and therefore we have no issues to raise*'.

3.4.2.2 River Mease SAC

The next nearest European Site is the River Mease SAC. The River Mease has been screened out of this assessment. The river and its catchment area lie outside of Coventry and its 20km buffer (see Figures 2, 10). Coventry lies in the Severn River Basin District, whereas the River Mease lies in the adjacent Humber River Basin District. Figure 7 illustrates the proximity and flow of the Rivers Tame, Anker, Mease and Trent to Coventry. None of these rivers run within or close to Coventry and hence there can be no LSE to the River Mease from any pollution incidents from any proposed development as part of the Coventry Local Plan and Coventry City AAP. For this reason the River Mease SAC is screened out of this HRA.

3.4.2.3 Other English and Welsh SACs

All other European Sites just outside the 20km buffer zone (see Figure 2) have been screened out as it has been concluded that the Coventry Local Plan and Coventry City AAP will not impact these sites. Justification is provided in Table 5.

Figure 8 illustrates the proximity of other European Sites within the adjacent Severn, Humber, Thames and Anglia River Basin Districts. In March 2014, Severn Trent Water confirmed that it was not anticipating the current development proposed as part of the 2012 Coventry Core Strategy Consultation Draft would result in any water required for this development being sourced from Wales. Given the increase in housing development now proposed in the updated 2015 Coventry Local Plan, Severn Trent Water was contacted again to determine the anticipated source of water supply (and capacity for waste water) for new development in Coventry to help determine if this will be an issue.

In a letter dated 26.11.15 Severn Trent Water stated that *'we can confirm that the source of water for Coventry is local as is not supplied from Wales. The waste goes to our sewage treatment works at Finham, Coventry.'* Severn Trent Water also confirmed in further email correspondence, that the existing supply to Coventry will continue to be from local sources throughout the lifetime of the Coventry Local Plan and this includes all the additional development (i.e. the higher number of houses now proposed from the 2012 HRA). Correspondence with Severn Trent Water is provided in Appendix 1, Section 1.2.

SAC	Screen In or Out?	Justification / Notes
Ensor's Pool	SCREENED OUT	The pool lies approximately 7.4km to the north of Coventry's boundary. It will therefore not be directly impacted by any proposals within either the Coventry Local Plan or Coventry City Area Action Plan. Previous correspondence with the Environment Agency in relation to the Warwickshire Minerals Plan confirmed that any planning applications within 3km of Ensor's Pool should be considered for a project level HRA in relation to potential hydrogeological impacts. Given Coventry's boundary is beyond the 3km buffer around Ensor's Pool (see Figure 1), this site is screened out of this HRA on this basis. Correspondence with the Environment Agency in December 2015 confirmed that the Environment Agency have nothing planned in Coventry that can impact upon these designated sites and hence they have no issues to raise in relation to this HRA.
Bredon Hill	SCREENED OUT	The site is on a hill outside of Warwickshire and beyond the 20km buffer around Coventry hence is not considered at risk from the Coventry Local Plan or Coventry City Area Action Plan.
Cannock Extension Canal	SCREENED OUT	The site is outside of Warwickshire and beyond the 20km buffer around Coventry; not connected by any water courses flowing out of Coventry and is within the adjacent Humber River Basin District, whereas this European Site is within the Severn River Basin District. On this basis the site is screened out.
Lyppard Grange Ponds	SCREENED OUT	The site is outside of Warwickshire and Coventry and is considered too far to be impacted by the plan and there is no direct connection to water courses flowing from Coventry and this site.
River Mease	SCREENED OUT	Figure 2 illustrates that the River Mease and its catchment area lie outside both Coventry and the 20km buffer zone around Coventry. Coventry lies within the Severn River Basin District whereas the River Mease lies within the adjacent Humber River Basin District. Furthermore, Figure 7 illustrates how neither of the principal rivers that flow into the River Mease (the River Anker, River Tame and River Trent) flow near or within Coventry and hence there can be no LSE from any theoretical pollution to the River Anker or its catchment from any development under the Coventry Local Plan or Coventry City AAP.
Welsh SACs	SCREENED OUT	During the 2012 HRA for the former Coventry Core Strategy (WCC 2012), Natural England had raised concerns of possible LSE on hydrologically dependant SACs in Wales. Their query related to where the proposed water supply for new development (in particular residential schemes) was to be sourced. Natural England highlighted that if Severn Trent Water were anticipating extracting or utilising water from Wales to growing Midland conurbations, including Coventry, this could have a potential LSE on hydrologically dependant SACs in Wales (see Figure 8). Given the increase in housing numbers from the previous proposals in 2012 to this current 2015 draft, WCC contacted Severn Trent Water again to determine if this increase in numbers and possible density of housing would mean that water supply from Wales would be used for the new proposed development in the Coventry Local Plan. Seven Trent Water's response confirmed that <i>'the source of water for Coventry is local as is not supplied from Wales'</i> and that that future water supplies from Coventry for the lifetime of the plan will come from local sources and not Wales. For this reason any LSE on Welsh SACs by the Coventry Local Plan or Coventry City Area Action Plan have been screened out.

Table 4: Further scoping of European Sites to consider in the HRA of the Coventry Local Plan and Coventry City AAP

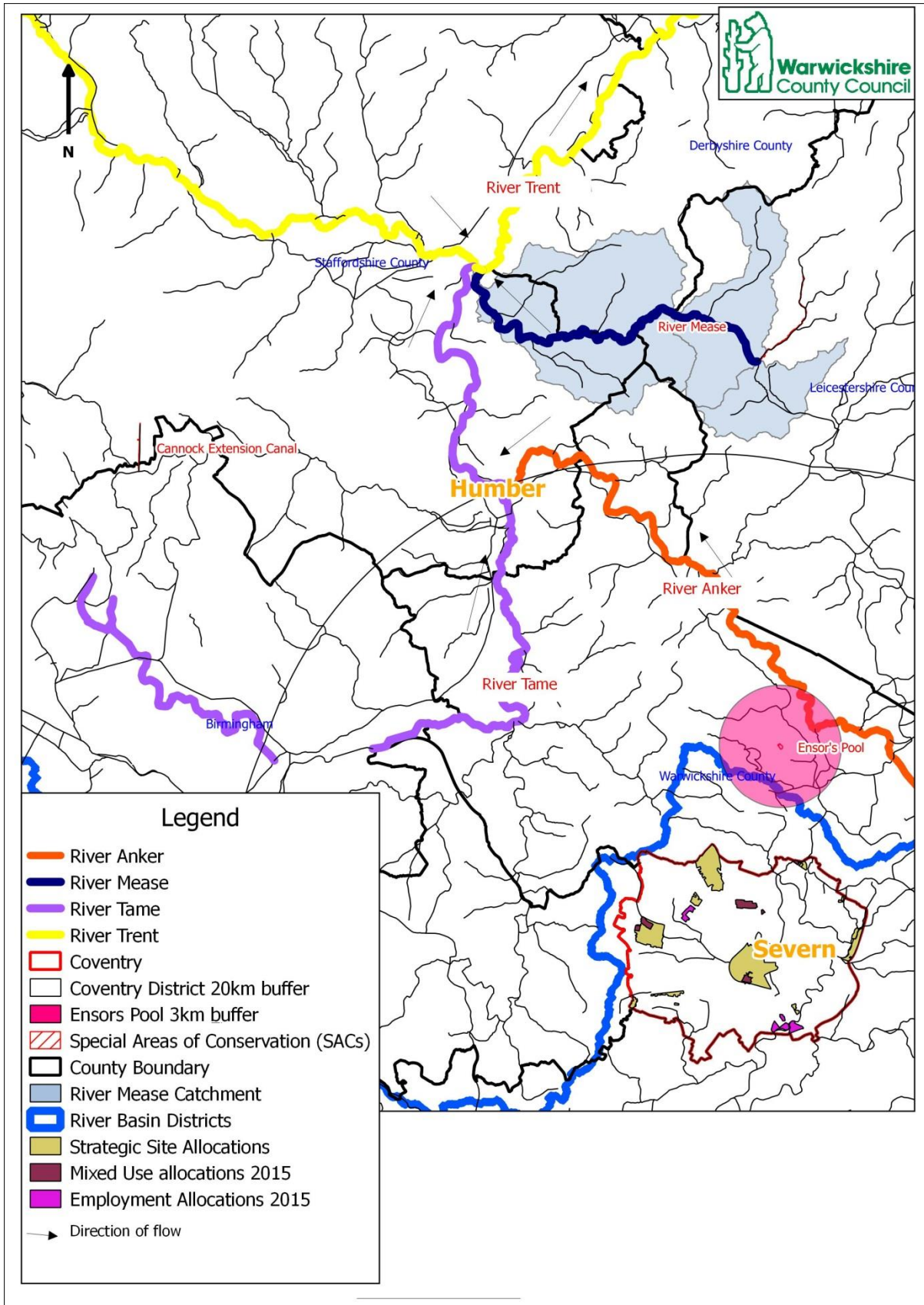


Figure 7: Proximity and flow of the Rivers Tame, Anker, Mease and Trent in relation to the River Mease catchment and Coventry

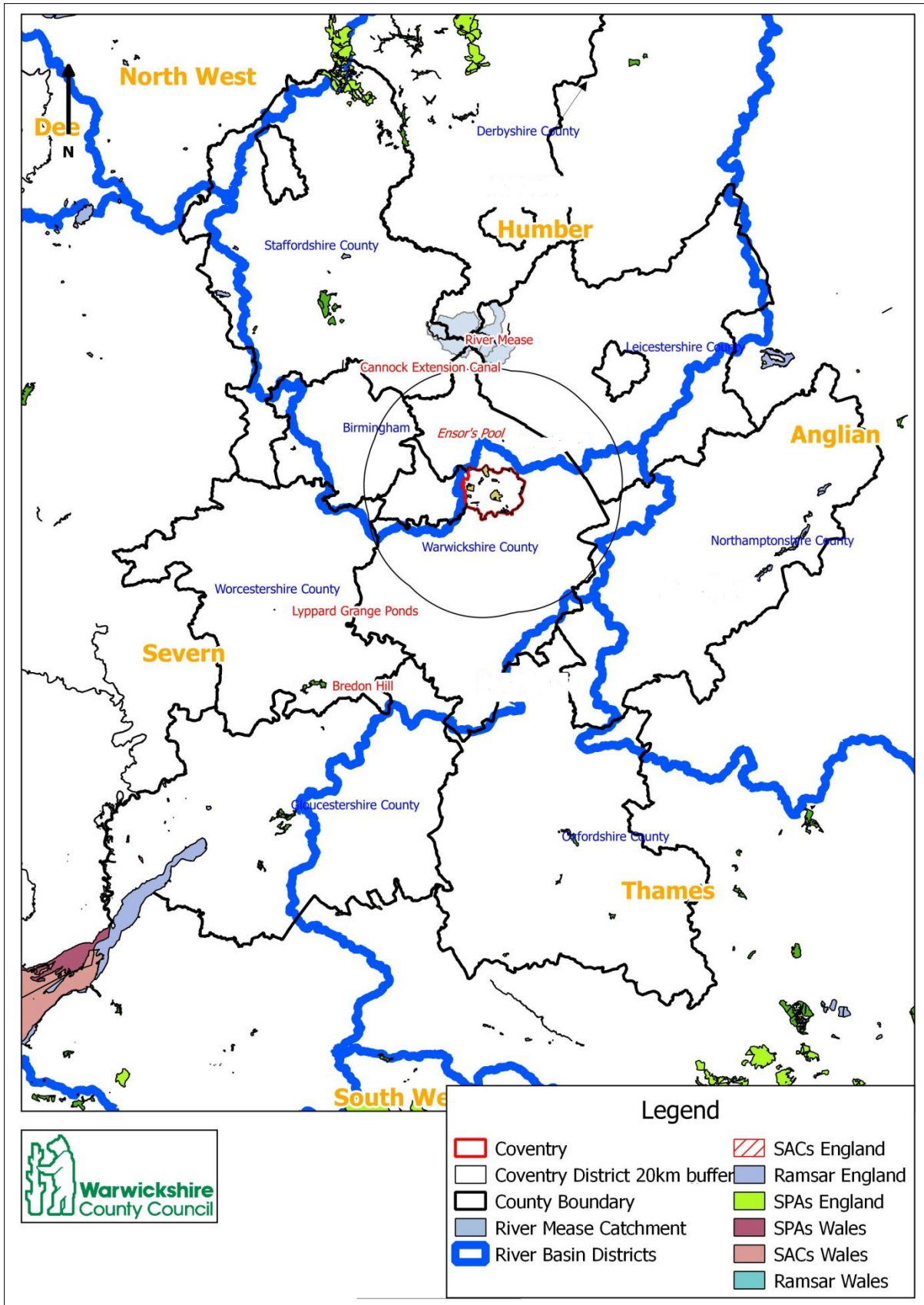


Figure 8: Proximity of European Sites within the wider area around Coventry

3.4.3. Potential Functional Pathways

Table 5 below highlights the key identified potential functional pathways between any likely generic impacts of development as a result of the plans and the identified specific vulnerabilities and issues of concern relating to their Conservation Objectives of Ensor’s Pool (as per Table 2, Section 3.4.2.1 and Appendix 2). This table draws on a similar approach used by Staffordshire County Council when undertaking their screening of allocated Sites of their new Minerals Local Plan in June 2015 (Staffordshire County Council 2015).

Potential Environmental Impact / Threat	Comment
<p>Water quality: Direct Pollution</p> <p>Pollutants could be potentially discharged from the proposed development sites either directly into an adjacent water course (as waste water run-off) or during surface water flooding events. These pollutants could increase the existing nutrient levels already present within a watercourse / catchment as well as increasing the level of sedimentation that could be detrimental to the SAC and its qualifying features.</p> <p>There is also a risk from minor fuel and oil leaks and spills during proposed development operations, this could be direct or indirect through surface or ground water pollution.</p>	<p>Coventry lies within a different River Basin District (Severn Basin District) from Ensor’s Pool that lies within the Humber Basin District. Therefore no LSE are anticipated from any development as part of the Coventry Local Plan from direct pollution via waste water run-off or minor fuel or oil leaks and spills that could change the water quality (e.g. increasing siltation) that could impact the population of white-clawed crayfish for which the site is designated.</p> <p>The EA have confirmed that nothing is planned in Coventry that can impact Ensor’s Pool (December 2015). It is considered that Ensor’s Pool SAC is too far (7.4 km away) from Coventry’s boundary and hence pollution via ground water is not anticipated.</p> <p>The Surface Water Flooding zone around Ensor’s Pool is illustrated in Figure 9 in Appendix 3. This zone only lies locally around the site and within the adjacent River Basin district. Hence any impacts via surface water flooding from the Coventry Local Plan and Coventry City AAP can be screened out.</p>
<p>Water quality: Indirect Pollution from Air Pollution</p>	<p>The Air Pollution Information System (APIS) website⁵ provides guidance on the main air pollutant releases associated with ‘<i>Road transport</i>’ and ‘<i>Domestic combustion</i>’. These are considered to be the two most likely causes of air pollution as a result of the Coventry Local Plan and Coventry City Area Action Plan. Air pollutants listed include: Nitrogen oxides</p>

⁵ <http://www.apis.ac.uk/> accessed December 2015

<p>Sedimentation impacts through air pollution via wet deposition (where pollutants are removed from the atmosphere by precipitation) or dry deposition (deposition of gases and aerosols directly to the Earth's surface⁵).</p>	<p>(NO_x), Sulphur Dioxides (SO₂), Ammonia (NH₃), Particulates (PM), Heavy Metals, Halogens (HCl, HF), Volatile Organic Compounds (VOC) and Polycyclic Aromatic Hydrocarbons (PAH).</p> <p>APIS confirm that deposition of <i>'ammonia, nitrate and other forms of nitrogen from the atmosphere could be'</i> a significant cause of nitrogen pollution where there is limited agricultural activity such as upland areas, however this is not considered to be relevant to rural Warwickshire or Coventry.</p> <p>APIS also confirms the acidification of rivers and streams impacts <i>'aquatic biota at all levels of the food chain'</i> including <i>'aquatic algae and macrophytes to macroinvertebrate (e.g. white-clawed crayfish), fish and even water birds'</i>. Acidification can reduce species biodiversity and lead to <i>'Aquatic animals (invertebrates and fish)'</i> being <i>vulnerable to increased aluminium, hydrogen ion and heavy metal toxicity'</i>.</p> <p>The APIS also provides a 'Site Relevant Critical Loads' tool that provides critical loads of acidity and nitrogen for every SAC in the UK including the white-clawed crayfish known at Ensor's Pool. Some pollutants require consideration at the site specific level, however the critical level of certain others is provided below:</p> <ul style="list-style-type: none"> • NH₃ Critical Level is 3 (2-4 µg NH₃ m⁻³) (set for Higher Plants) – although needs to be considered at the site specific level. • NO_x Critical Level 30 µg NO_x/m³ annual mean and 75 µg NO_x/m³ 24 h- hour mean • Nitrogen Deposition in Kg N/ha/yr max, min and average = 13.72 • Acid Deposition Kg/ha/yr max, min and average = 0.98 0.33 • Ammonia Concentration µg/m³ max, min and average = 1.98 • NO_x Concentration µg/m³ max, min and average = 15.95 • SO₂ Concentration µg/m³ max, min and average = 2.52 <p>No LSE anticipated. There is little information on the zone of influence of air pollutants. The Design Manual for Roads and Bridges (DMRB) considered a 2km buffer around a SAC to trigger the requirement of an HRA. Cornwall County Council cite 200m as a buffer for significant effects from the air quality impacts of increased traffic generated emissions (Parsons Brinckerhoff 2012). Given that Coventry lies approximately 7.4km from Ensor's Pool any indirect impacts to Ensor's Pool via air pollution are screened out of this assessment.</p>
<p>Water quantity / changes in water levels / drainage</p>	<p>River flows can be impacted by water abstraction (could reduce flow) required to supply new residential and other new development under the Coventry Local Plan and Coventry City AAP. Neither Severn Trent Water nor the Environment Agency have highlighted any concerns regarding Ensor's Pool or hydrologically dependant Welsh SACs and water abstraction.</p>

	<p>The Environment Agency's Groundwater Team have also highlighted that any development within 2-3km of Ensor's Pool could have a hydrogeological connection to Ensor's Pool, so would require further investigation on potential impacts to the SAC including water level changes. Given Ensor's Pool lies over 7km from Coventry boarder any hydrogeological impacts can be screened out.</p> <p>No proposed development within the surface water flooding zone around Ensor's Pool (see Figure 9 in Appendix 3) is anticipated as part of the Coventry Local Plan.</p>
Introduction of invasive non-native species, particularly non-native crayfish species but also bottom feeding coarse fish	It is considered that the introduction of invasive non-native species into Ensor's Pool is not a LSE of the Coventry Local Plan, given the distance from Coventry and the fact that Ensor's Pool is not a destination likely to attract tourists for recreation. Hence direct introduction of non-native species is not considered further.
Direct disturbance: e.g. removal of natural aquatic vegetation and direct physical disturbance of Ensor's Pool	No LSE anticipated, Coventry is at least 7km from Ensor's Pool SAC.
Indirect disturbance: e.g. from light and noise	No LSE anticipated, Coventry is at least 7km from Ensor's Pool SAC

Table 5: Key functional pathways for potential LSE from the Coventry Local Plan and Coventry City AAP.

3.5. Screening Assessment

The screening of the Coventry Local Plan and the Coventry AAP has been undertaken following guidance and specific ‘screening categories’ provided in the HRA Handbook 2016, listed in Table 6 below.

The results of the screening for the Coventry Local Plan and Coventry AAP are provided in Table 7 and 8 respectively in Appendix 4. Justification is provided as to why these have been screened in or out of any further assessment.

Category	Justification	Screened In or Screened Out?
	Administrative Text – introductory text about the plan	Screened out
	The plan makers ‘vision’ or ‘general aspiration’	Screened out
	General Statements of overall goals	Screened out
	General Statements of broad objectives (implications are assessed under policy xx below)	Screened out
A	General Statement of policy / general aspiration	Screened out
B	Policy listing general criteria for testing the acceptability / sustainability of proposals	Screened out
C	Proposal referred to but not proposed by the plan	Screened out
D	Environmental protection / site safeguard policy	Screened out
E	Policies or proposals which steer change in such a way as to protect European sites from adverse effects	Screened out
F	Policy that cannot lead to development or other change	Screened out
G	Policy or proposal that could not have any conceivable effect on a site	Screened out
H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)	Screened out
I	Policy or proposal with a likely significant effect on a site alone	Screened in
J	Policy or proposal with an effect on a site but not likely to be significant alone, so need to check for likely significant effects in combination	
K	Policy or proposal not likely to have a significant effect either alone or in combination	Screened out after in-combination test
L	Policy or proposal likely to have significant effect in combination	Screened in after the in-combination effect

Table 6: The HRAs Handbook 2016 screening categories

3.5.1. Screening of the Coventry Local Plan and Coventry AAP

All the policies within the Coventry Local Plan and Coventry AAP were screened out in terms of having any LSE on any European Sites. The detailed results of this screening are provided in Tables 7 and 8 in Appendix 4.

A short-fall in housing and employment land has been identified via the Objectively Assessed Need Assessment for Coventry that cannot be accommodated within the administrative boundary of Coventry City Council through this plan. This will be delivered in the future through the duty to cooperate with neighbouring districts and boroughs. The implications of any additional development of this nature will be incorporated into the specific local plans for the relevant neighbouring district or borough that will require their own separate HRA.

4. In-combination Assessment

The requirement for an In-combination Assessment as part of the HRA is outlined under Article 6 (3) of the Habitats Directive. The HRA Handbook 2016 states that *'European Commission guidance and case law establishes that the underlying intention of the in combination provision is to take account of cumulative effects.'*

The ten steps in the screening assessment of in-combination effects are provided in Figure 6 in Section 1.2.

The new principle 17 in the In-combination Assessment section of the HRA Handbook 2016 states that *'where a plan or project has no adverse effect on a site at all, no 'in combination' test is necessary because it cannot contribute to any cumulative effects.'* This was clarified by the recent High Court judgment: Foster and Langton⁶

The results of the Stage 1 screening of both the Coventry Local Plan and the Coventry Area Action Plan concluded that neither of these plans were considered to have any Likely Significant Effects on any European Sites either alone or in-combination with other plans or projects. Given this conclusion, it is considered that cumulative effects can be eliminated for these plans and no In-combination Assessment is required (see step 2 of Figure 6: Ten steps in the screening assessment of in-combination effects, in Section 1.2).

Natural England in their initial consultation response dated 04.12.15 *'In regard to the wider question of any issues, direct or in-combination that Natural England would like to raise as this early stage there are currently no further issues in addition to those we would expect to be picked up through the screening process.'*

⁶ Foster and Langton v Forest of Dean District Council [2015] EWHC 2648 22nd September.

5. Summary and Next Steps

This Stage 1 HRA has considered all aspects of the current versions of the Coventry Local Plan and Coventry City AAP and concluded that neither plan will have any LSE on any European Sites.

The next steps are as follows:

- This HRA report should be sent to Natural England and the Environment Agency for consultation and comment; this could be done as part of the public consultation due in January 2016.
- Following consultation, and provided consultees (Natural England and the Environment Agency) are in agreement that no LSE are anticipated either alone or in-combination, the plan can be authorised and the final HRA report produced and the template within Appendix 5 of this report completed.

6. References

Amec Foster Wheeler (AFW). 2015. Coventry Water Cycle Study. Final Report dated 3 November 2015.

Coventry City Council (CCC). 2016a. Coventry City Council Local Plan proposed publication draft January 2016.

Coventry City Council (CCC). 2016b. Coventry City Council City Area Action Plan proposed publication draft January 2016.

DMRB (Design Manual for Roads and Bridges). 2009. Highways Agency and partners.

DTA David Tyldesley and Associates. 2016. The Habitat Regulations Assessment (HRA) Handbook 2016. Accessed via <http://www.dtapublications.co.uk/handbook/browse> to which WCC are a subscriber.

Natural England. 2008. Conservation Objectives for Ensor's Pool SSSI.

Natural England. 2014a. Press Release dated 08.11.14.

Natural England. 2014b. Site Improvement Plan for Ensor's Pool. November 2014 via <file:///C:/Users/leoandlouise/Downloads/SIP141105FINALv1.0%20Ensors%20Pool.pdf>

Natural England. 2015. White-clawed crayfish survey for Ensor's Pool SSSI/SAC (Warwickshire). Ensor's Pool Special Area of Conservation (SAC). Improvement Programme for England's Natura 2000 Sites (IPENS) – Planning for the Future IPENS065. 30 October 2015.

Parsons Brinckerhoff. 2012. Habitat Regulations Screening Assessment. St Austell, St Blazey and China Clay Area Regeneration Plan for Cornwall Council May 2012.

Planning Inspectorate. 2013. Habitat Regulations Assessment. Advice note ten: Habitat Regulations Assessment relevant to nationally significant infrastructure projects. Version 5 dated August 2013 (known as PINS Advice note 10 in the text).

Scottish Natural Heritage. 2012. Habitats Regulations Appraisal of Plans. Guidance for Plan-Making Bodies in Scotland Version 2.0. August 2012.

Staffordshire County Council. 2015. The new Minerals Local Plan for Staffordshire 2015 to 2030. Habitat Regulations Screening of Allocated Sites. June 2015.

Warwickshire County Council. 2010. Local Transport Plan Habitat Regulations Appropriate Assessment.

Warwickshire County Council. 2012. Coventry City Council – Core Strategy Habitat Regulations Appropriate Assessment. Screening Report. July 2012.

Legislation, Other Policy and websites consulted.

Air Pollution Information System. www.apis.ac.uk

Conservation of Habitats and Species Regulations 2010 (as amended)

European Birds Directive 79/409/EC

European Habitats Directive 92/43/EEC

European Codified Birds Directive 2009/147/EC

European Strategic Environmental Assessment (SEA) Directive 2001/42/EC

Joint Nature Conservancy Council (JNCC) Website <http://jncc.defra.gov.uk> on December 2014

Natural England (NE) website

<http://publications.naturalengland.org.uk/publication/5415467531370496?category=5134123047845888> –

National Planning Policy Framework (NPPF). Department for Communities and Local Government. March 2012.

HRA Case Law:

The Ribble Case Reference: RSPB v Secretary of State for Environment Food and Rural Affairs, ‘BAE Systems (Operations) Ltd and Natural England’ 18th March 2015, [2015] EWHC Cv 227.

The Waddenzee Case: Ruling from the European Court of Justice (ECJ) C-1272/02 Waddenzee (Netherlands).

Foster and Langton. Reference: Foster and Langton v Forest of Dean District Council 22nd September 2015 [2015] EWHC 2648.

Appendix 1: Key Consultation Responses

1.1. Natural England Correspondence

1.1.1. Correspondence from Antony Muller, Lead Adviser

12/9/2015

Warwickshire County Council Mail - Ensor's Pool SAC update



Louise Mapstone <louisemapstone@warwickshire.gov.uk>

Ensor's Pool SAC update

Muller, Antony (NE) <Antony.Muller@naturalengland.org.uk> 2 December 2015 at 16:48
To: "louisemapstone@warwickshire.gov.uk" <louisemapstone@warwickshire.gov.uk>

Dear Louise

Our reference 171168

Thank you for your email dated 10 November 2015. I've set out your questions below together with our responses:

We would be interested to know if:

1) There has been any change in SSSI/SAC designation of Ensor's Pool since our last correspondence (your email dated 24.08.15 and letter dated 03.07.15) in relation to a Habitats Regulation Assessment (HRA).

No change.

2) If the new anticipated 'supplementary information' for Ensor's Pool has been produced yet? If it has we would like to have a copy. If not, it would be helpful to have an indication of likely publication date, to ensure we can take any revisions into account when undertaking further HRA work over the next few months.

No, the 'supplementary information' for Ensor's Pool SAC has not been produced. The SAC is not on the priority list for the supplementary information package to be written.

3) Do you have any further information on the work you conducted on assessing the current status of the WCC population at Ensor's Pool this autumn? We assume the results of this study will be available shortly and would be good to have this information and an idea of when it might become available.

Surveys for white clawed crayfish were carried out in September 2014 (trapping survey), October 2014 (Dive survey), June – September 2015 (Bioassay) and September 2015 (trapping survey). Natural England has now received the results of the latest survey. We conclude that the population of native white-clawed crayfish is no longer present at Ensor's Pool. Natural England is now considering these results and their implications in conjunction with our national specialists and the ecologists who undertook the surveys.

Natural England is committed to ensuring that our advice is based on the best available information and we aim to keep you up to date with progress accordingly. Please get in touch if you have any further questions that arise from the information above.

Kind regards

Antony

Antony Muller

Lead Adviser

Sustainable Development & Wildlife Team - North Mercia Area

Direct dial - 0300 060 1640

Mobile - 07971 294109

<https://mail.google.com/mail/u/0/?ui=2&ik=35403fb78&view=pt&sq=Antony.Muller%40naturalengland.org.uk&cp=true&search=query&msg=151639865cab...> 1/2

Date: 03 July 2015
Our ref: 157743
Your ref: Email 24.6.15



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Warwickshire Ecology Unit

FAO Louise Mapstone

BY EMAIL ONLY

Dear Louise

Consultation: Request for advice regarding Habitats Regulations Assessment of plans or projects in relation to Ensor's Pool Special Area of Conservation (SAC)

Thank you for your phone call and email about the above on 24 June 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Our advice letter of 14.1.15 still applies. Natural England confirms there is no change to the SSSI/SAC designation. We advise that Habitats Regulations Assessment (HRA) of plans and projects with the potential to affect the site should therefore be carried out on a 'business as usual' basis.

We continue to work with the Nuneaton and Bedworth Borough Council and the Environment Agency in order to decide what actions can be taken to address the loss of white clawed crayfish population at Ensors Pool.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact me on 0300 060 1640. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Antony Muller
Lead Adviser – Sustainable Development and Wildlife Team – North Mercia Area

Date: 14 January 2015
Our ref: 140335
Your ref: Email 17.12.14



Warwickshire Ecology Unit

For the attention of Louise Mapstone

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Louise

Consultation: Request for advice regarding Habitats Regulations Assessment of plans or projects in relation to Ensor's Pool Special Area of Conservation (SAC)

Thank you for your consultation on the above dated 17 December 2014 which was received by Natural England on the same day. We are grateful for the extra time to reply.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England confirms there is no change to the SSSI/SAC designation. We advise that Habitats Regulations Assessment (HRA) of plans and projects with the potential to affect the site should therefore be carried out on a 'business as usual' basis.

We are co-ordinating further investigations to confirm the presence of native crayfish in the Pool and further explore the reasons for the reduction or loss of the population. Depending on the outcome of our investigations we will be exploring options for restoration/reintroduction taking into account the practicalities of a site with public access. Any review of the designated site's condition will be carried out after this investigation work is complete.

I attach a copy of the media information about the SAC (released on 8.11.14).

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact me on 0300 060 1640. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Antony Muller
Lead Adviser – Sustainable Development and Wildlife Team – North Mercia Area

HRA of Warks Minerals Plan - update

Muller, Antony (NE) <Antony.Muller@naturalengland.org.uk>
To: Louise Mapstone <louisemapstone@warwickshire.gov.uk>
Cc: "Steer, Eric (NE)" <Eric.Steer@naturalengland.org.uk>

24 August 2015 at 17:10

Hi Louise

Our reference – 159832

Hope you had a good holiday. Some feedback following your email of 30.7.15:

HRA process

Happy to discuss this over the phone but in essence:

The favourable condition table document provides information based on using common standards monitoring. This is for use when assessing the condition of designated sites. Although to some extent you can use the FCT as part of your HRA thought process I would advise that your approach in the context of a development plan is very likely to need a wider consideration of potential impacts/ pathways that the FCT tables won't help with. Nonetheless I appreciate that in the context of the Ribble case it makes sense to ensure you take account of relevant information, such as the FCT document, as an interim measure.

The primary focus for your attention should be on the 'European site conservation objectives' for the relevant N2k site. Link to list of relevant docs here:

<http://publications.naturalengland.org.uk/category/5134123047845888>

As you may be aware work is in hand to supplement these updated conservation objectives with 'supplementary information'. Although this information has not yet been produced for Ensor's Pool SAC I attach a copy of our new operational standard which provides a full description of the revised approach.

In terms of the way forward, until such time as the supplementary information for relevant N2k sites is available we would encourage an iterative approach whereby you keep in touch with us as you carry out HRA of development plans. We propose that as you identify candidate impact 'pathways' that generate a need for environmental information to complete the thought process (and that might in the fullness of time be included in the forthcoming 'supplementary information' document) you can contact us to agree next steps. We envisage a 'light touch' here.

1.1.2. Correspondence with Steph Jones, Adviser

12/8/2015 Warwickshire County Council Mail - CONFIDENTIAL consultation - HRA of Coventry's Local Plan

Louise Mapstone <louisemapstone@warwickshire.gov.uk>

CONFIDENTIAL consultation - HRA of Coventry's Local Plan
1 message

Jones, Steph (NE) <Steph.Jones@naturalengland.org.uk> 4 December 2015 at 18:26
To: "louisemapstone@warwickshire.gov.uk" <louisemapstone@warwickshire.gov.uk>

Louise,

I am covering Warwickshire within the South Mercia Team and have had your email in relation to the above passed on for a response.

I am aware that you have had correspondence from Antony Muller in relation to the most recent information available for Ensors Pool SAC and so I refer you to his steer in relation to that particular issue.

I regards to a the wider question of any issues, direct or in-combination that Natural England would like to raise at this early stage there are currently no further issues in addition to those we would expect to be picked up through the screening process. I am aware that Warwickshire County Council has both its Mineral Strategy and Local Flood Risk Management Strategy under-development and any in-combination considerations here may be of interest to the Coventry Local Plan as these strategic plans progress.

Please feel free to contact me at any time if you wish to discuss this plan's development both in regards to this response or for any other questions.

Kind Regards

Steph Jones
Adviser - Sustainable Development South Mercia Team
Natural England
Mail Hub Block B
Whittington Rd, Worcester, WR5 2LQ
M: 07917 041195

Follow the South Mercia team on Twitter - [@NESouthMercia](#)

Natural England offers two chargeable services – The Discretionary Advice Service (DAS) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service (PSS) provides advice for protected species mitigation licence applications.

These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England is accredited to the Cabinet Office Customer Service Excellence Standard

<https://mail.google.com/mail/u/0/?ui=2&ik=35403ffb78&view=pt&search=inbox&th=1516e3f01541fa60&siml=1516e3f01541fa60> 1/2



Louise Mapstone <louisemapstone@warwickshire.gov.uk>

CONFIDENTIAL consultation - HRA of Coventry's Local Plan

1 message

Louise Mapstone <louisemapstone@warwickshire.gov.uk> 13 November 2015 at 11:07
To: "Melvin, Jamie (NE)" <Jamie.Melvin@naturalengland.org.uk>, Hayley.Fleming@naturalengland.org.uk,
"Cheese, Kayleigh (NE)" <kayleigh.cheese@naturalengland.org.uk>
Cc: David Lowe <davidlowe@warwickshire.gov.uk>, "Berry, Christopher" <Christopher.Berry@coventry.gov.uk>

Dear Hayley, Kayleigh and James

I write in reference to an HRA that I am undertaking of the current draft of the Coventry Local Plan on behalf of Coventry City Council. The new Coventry Local Plan sets out proposed development in Coventry between 2011 to 2031 and will be out for public consultation in the new year.

I am writing to consult you on a confidential basis on if there are any issues or concerns about this new plan in relation to European Sites that you wish to raise at the screening stage?

I can provide further details of the plan and a proposals map (on a confidential basis) next week, should you require it in order to help your response, please let me know the level of information you require to provide a consultation response.

In particular we would like a targeted response and advice from Natural England regarding if there are any specific plans or projects that we should be aware of whilst undertaking this HRA particularly regarding the in-combination assessment part of the HRA.

I have already contacted Antony Muller in Natural England, regarding the current status of white clawed crayfish at Ensor's Pool, given its recent history and the survey work and investigations into the recent white clawed crayfish decline in the pool that you have been undertaking this autumn. I hope the results of this study will be available soon.

In previous consultations with Natural England in relation to earlier drafts of the Coventry Local Plan we agreed a 20km buffer around Coventry for the HRA. We proposed to use this again for this assessment. Please can you confirm you are happy with this, or if you require a larger or smaller buffer with your reasoning.

I have copied you all into this email as I am not sure who is currently dealing with HRA and policy issues and I know you have all had involvement in this work over the last few years.

I would be grateful if you could pass this email on to the relevant contact in Natural England highlighting the fact that at this stage, the contents of Coventry's Local Plan are confidential ahead of a public consultation in the New Year.

We will also be consulting the Environment Agency and Severn Trent Water in relation to this HRA.

<https://mail.google.com/mail/u/0/?ui=2&ik=35403ffb78&view=pt&search=sent&th=1510087167deb5cc&siml=1510087167deb5cc>

1/2

I look forward to hearing from you

Sincerely

Louise Mapstone MSc CEnv MCIEEM AEMA
Ecologist
Warwickshire County Council

1.2. Severn Trent Water Correspondence

26 November 2015



Our ref.

Coventry 2

Consultation to STW - the new Coventry Local Plan HRA

Specific Response

We can confirm that the source of water for Coventry is local as is not supplied from Wales. The waste goes to our sewage treatment works at Finham, Coventry.

Additional Information

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the local planning authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

Sewage Strategy

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

Surface Water and Sewer Flooding

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be

managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands. Once detailed plans are available we can provide further comments on water supplies in specific areas.

Water Efficiency

Building Regulation requirements specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

We hope this provides you with useful information. We look forward to providing you with more comprehensive comments when more detailed plans and geographical locations of developments become available.

Daryl Fossick

Growth.development@severntrent.co.uk

12/8/2015

Warwickshire County Council Mail - Re: Confidential Consultation to STW - the new Coventry Local Plan HRA



Louise Mapstone <louisemapstone@warwickshire.gov.uk>

Re: Confidential Consultation to STW - the new Coventry Local Plan HRA

Louise Mapstone <louisemapstone@warwickshire.gov.uk>

26 November 2015 at 11:01

To: "Fossick, Daryl" <Daryl.Fossick@severntrent.co.uk>

Cc: David Lowe <davidlowe@warwickshire.gov.uk>, "Berry, Christopher" <Christopher.Berry@coventry.gov.uk>

Dear Daryl

Many thanks for your response to our query in our original email to STW dated 13.11.15 and resent on 20.11.15.

It is very helpful to know that the current source of water for Coventry is from local sources and not from Wales. Are you able to confirm, that this will continue to be the case for the development proposed in the new Coventry Local Plan? i.e. future (upto 2031) as well as existing sources of supply to Coventry will all come from local sources and not Wales?

You will be aware that a minimum of 24 600 new houses (between 2011 to 2031) is now proposed as part of the new Coventry Local Plan, as opposed to the previous figure of 11 373 that we consulted on in 2014.

It would be very helpful if you could provide us with some clarity on this.

We look forward to hearing from you.

Sincerely

Louise Mapstone MSc CEnv MCIEEM AIEMA
Ecologist
Warwickshire County Council



Louise Mapstone <louisemapstone@warwickshire.gov.uk>

Re: Confidential Consultation to STW - the new Coventry Local Plan HRA

Fossick, Daryl <Daryl.Fossick@severntrent.co.uk>
To: Louise Mapstone <louisemapstone@warwickshire.gov.uk>

26 November 2015 at 13:55

Hi Louise

I can confirm that this will still be the case.

Daryl

Daryl Fossick

Water Efficiency Advisor

☎ Mobile 07703717998

✉ Email Daryl.Fossick@severntrent.co.uk



Louise Mapstone <louisemapstone@warwickshire.gov.uk>

CONFIDENTIAL Consultation - the new Coventry Local Plan HRA

Louise Mapstone <louisemapstone@warwickshire.gov.uk>

13 November 2015 at 10:48

To: peter.davies@severntrent.co.uk

Cc: David Lowe <davidlowe@warwickshire.gov.uk>, "Berry, Christopher" <Christopher.Berry@coventry.gov.uk>

Dear Peter

I write on behalf of Coventry City Council for whom we are in the process of undertaking a Habitat Regulations Assessment (HRA) of their new Coventry Local Plan that aims to set out housing and other development needs in Coventry for the period 2011 to 2031. My colleague David Lowe in 2014 contacted you in relation to the HRA for the adjacent district of Warwick, further to concerns raised by Natural England during the HRA process (for both Warwick and Coventry) regarding proposed water supply to both Coventry and Warwick. Natural England and the Countryside Council for Wales (CCW) (now Natural Resources Wales (NRW)) had highlighted concerns that if STW were anticipating extracting or utilising water from Wales to growing Midland conurbations (including Coventry and Warwick District) this could impact hydrologically dependent Welsh SACs (Special Areas of Conservation – European Sites).

At the time (March 2014) you confirmed that future supply to both Warwick and Coventry was to come from local sources and not Wales – are you able to confirm if this is still the case now?

I am contacting you on a confidential basis with the permission of Coventry purely for the purposes of undertaking a HRA. Our last HRA was based on the 2012 Consultation Draft of Coventry Core Strategy where a minimum number of houses proposed was 11 373 between 2011 and 2028. The current proposed figures for the new Coventry Local Plan (that will be subject to public consultation in the new year) is currently a minimum of 24,600 houses between 2011 and 2031. Please note that this information is confidential, the new Coventry Local Plan also includes other development, and I can send you a plan with further details next week, should you require this in order to provide us with an answer regarding the source of water for this local plan.

In addition to your proposals for water supply, we would also be interested in where it is proposed that the waste water from development as part of the Coventry Core Strategy will go?

I am not sure if you are still the correct person to contact about this, if not, I'd be grateful if you could let me know whom in STW can answer this query for us.

We look forward to hearing from you

Sincerely

Louise Mapstone MSc CEnv MCIEEM AIEMA
Ecologist
Warwickshire County Council
Tel 07826 904421

1.3. Environment Agency Correspondence

1/5/2016

Warwickshire County Council Mail - CONFIDENTIAL initial consultation for Coventry Local Plan HRA



Louise Mapstone <louisemapstone@warwickshire.gov.uk>

CONFIDENTIAL initial consultation for Coventry Local Plan HRA

Louise Mapstone <louisemapstone@warwickshire.gov.uk>

20 November 2015 at 11:45

To: "Ross, Martin" <martin.ross@environment-agency.gov.uk>

Cc: "Berry, Christopher" <Christopher.Berry@coventry.gov.uk>, David Lowe <davidlowe@warwickshire.gov.uk>

Dear Martin

I hope all is well.

Following our correspondence regarding the Warwickshire Minerals Plan HRA, I am writing to you in relation to another HRA I am undertaking for Coventry on their new Coventry Local Plan that is due out for public consultation in the New Year.

I have had permission from Coventry to send you the following attached maps on a confidential basis for the purposes of the HRA only. The first map provides you with a context of Coventry in terms of nearby Special Areas of Conservation (SACs), EA River Districts and a 20km buffer zone around Coventry's boundary which we are using for the HRA, as this was the zone we used in a former HRA for Coventry Core Strategy a few years ago. You will see from the first map 'EA Map 1' that there is only one SAC within the 20km buffer around Coventry: Ensor's Pool SAC. Ensor's Pool lies within the Humber River Basin, whereas Coventry lies within the Severn River Basin. Further to our correspondence in September, in relation to the Council's Minerals Plan, you highlighted that your Groundwater Team would wish to be alerted for any proposals within 2-3km around Ensor's Pool. The map indicates the 3km buffer zone around Ensor's Pool; Coventry lies beyond this 3km buffer zone.

The second map attached 'EA Map 2' provides a more detailed view of the strategic housing, mixed use and employment sites that will be included in the forthcoming Coventry Local Plan. The last HRA we undertook for Coventry was based on the 2012 Consultation Draft of Coventry Core Strategy where a minimum number of houses proposed was 11 373 between 2011 to 2028. The current proposed figure for the new Coventry Local Plan is currently a minimum of 24, 600 houses between 2011 and 2031. Please note this information is currently confidential.

We would be grateful for an initial response from you on if there are any specific issues you consider need to be addressed as part of the HRA we are current undertaking. I have already contacted Natural England and also Severn Trent Water in relation to issues around water supply and where it is proposed that waste water from development as part of the Coventry Core Strategy will go. Our consultation for our previous HRA for Coventry and Warwick District local plans raised concerns over potential impacts to hydrologically dependent Welsh SACs by extracting or utilising water from Wales to growing Midland conurbations.

In addition we are also required to undertake an in-combination assessment as part of the HRA process and are required to consider other plans and projects in the area that would increase the likelihood or significance of any effects to European Sites that are identified in the HRA. The aim of the in-combination assessment is to protect European Sites from cumulative effects of more than one project when effects of projects action on the site alone would not be likely to be significant. I would welcome your views on any specific plans or projects in the area that you consider we should be including in the in-combination assessment, if any.

<https://mail.google.com/mail/u/0/?ui=2&ik=35403ffb78&view=pt&q=in%20martin%20ross&q=true&search=query&msg=15124b6ef0a10a24&siml=15124b...> 1/3

The following extract from the HRA handbook regarding the in-combination assessment may be helpful to you in relation the types of projects or plans are relevant:

'any plans or projects at the following stages may be relevant to an in combination assessment:

- a) Applications lodged but not yet determined;*
- b) Projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration;*
- c) Refusals subject to appeal procedures and not yet determined;*
- d) Projects authorised but not yet started;*
- e) Projects started but not yet completed;*
- f) Known projects that do not require external authorisation;*
- g) Proposals in adopted plans;*
- h) Proposals in finalised draft plans formally published or submitted for final consultation, examination or adoption.'*

Should you have any further queries, or require any additional information, please do not hesitate to get in touch and we look forward to hearing from you shortly.

Kind Regards

Louise Mapstone MSc CEnv MCIEEM AIEMA
Ecologist
Warwickshire County Council

2 attachments



Louise Mapstone <louisemapstone@warwickshire.gov.uk>

CONFIDENTIAL initial consultation for Coventry Local Plan HRA

Ross, Martin <martin.ross@environment-agency.gov.uk>
To: Louise Mapstone <louisemapstone@warwickshire.gov.uk>

23 December 2015 at 14:31

Hi Louise,

There is nothing planned in Coventry that can impact upon these designated sites and therefore we have no issues to raise. I'm assuming it was Severn Trent who raised the issue regarding the Welsh SAC's rather than ourselves?

Regards,

Martin

Martin Ross

Planning Specialist

Sustainable Places

Staffordshire, Warwickshire and West Midlands

☎ 01543 405047 (Internal 722 – 5047)

✉ martin.ross@environment-agency.gov.uk

📍 Environment Agency, 9 Wellington Crescent, Fradley Park, Lichfield, Staffordshire, WS13 8RR



|

Warwickshire County Council
Department Of Planning Transport &
Economic Strategy
PO Box 43
Warwick
Warwickshire
CV34 4SX

Our ref: UT/2008/104606/OR-
03/PO1-L01
Your ref:
Date: 16 September 2015

Dear Madam

HABITAT REGULATIONS ASSESSMENT FOR WARWICKSHIRE MINERALS PLAN

Thank you for your recent enquiry in relation to the above document.

With reference to the potentially sensitive receptors, we only consider that Ensors Pool and The River Mease catchment has the potential to be impacted by the proposed minerals sites.

Looking at the 30 potential site options, there are only 2 that are in close enough proximity to impact the sensitive receptors, so only these have been looked at in further detail. These are the Polesworth Site on the River Mease Catchment and Burton Hastings on Ensors Pool.

Polesworth and the River Mease

Upon closer inspection, the potential site at Polesworth drains into the River Anker catchment, running west towards Tamworth initially, instead of north to the River Mease. The Anker then joins the River Tame and finally the Trent, just upstream of the River Mease confluence with the River Trent. We can therefore conclude that there is no linkage between potential quarry site and the River Mease SAC.

Burton Hastings and Ensors Pool

Ensors Pool lies approximately 7km west of the potential site at Burton Hastings. It is again in close proximity to the headwaters of the River Anker, but it does not run closely enough to Ensors Pool to have any effect on it. Our Groundwater Team have reviewed the potential for Hydrogeological linkages between the quarry option and the pool and have found that there is no potential for impact upon Ensors Pool from the Burton Hastings site due to the underlying geology being completely different in the two locations. It may be also worth noting that for future reference, our Groundwater Team have stated that it is only worth flagging up sites within about 2-3 km of a sensitive

Environment Agency
9, Sentinel House Wellington Crescent, Fradley Park, Lichfield, WS13 8RR.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont/d..

receptor for checking.

However, we note that the 9 preferred sites do not include either location and therefore we are unlikely to have any further comments to make at any later stage of this particular process.

We are not aware of any plans or programmes that need to be considered as part of this assessment.

Yours faithfully

Mr Martin Ross
Planning Specialist

Direct dial 01543 405047
Direct e-mail martin.ross@environment-agency.gov.uk

End

2

Appendix 2: Summary of Former Detailed Conservation Objectives and Targets

Below is a summary of the former detailed Conservation Objectives and Targets for Ensor's Pool SAC (dated 2008).

Ensor's Pool – Summary of Detailed Conservation Objectives and Targets dated 2008

- To maintain the designated habitats in favourable condition, which is defined in part in relation to a balance of habitat extent (extent attribute). Favourable condition is defined at this site in terms of the following site-specific standards: On this site favourable condition requires the maintenance of the extent of each designated habitat type. Maintenance implies restoration if evidence from condition assessment suggests a reduction in extent. The estimated extent in 2008 was 1.89 ha of Standing Open Water. The site specific target is to have no artificial reduction in the wetted area.
- To maintain the native crayfish population at Ensor's Pool SSSI in favourable condition with reference to the following on-site specific standards. These include ensuring the population of native white-clawed crayfish is at least moderately high abundance, an absence of individuals infected with crayfish plague and porcelain disease (Thelohaniasis) should not affect more than 10% of the population.
- To maintain the standing open water habitat that supports the native crayfish at Ensor's Pool in favourable condition. Favourable condition of the supporting habitat is defined at this site in terms of the following site-specific standards. Biological Water Quality should be equivalent to Biological General Quality Assessment (GQA) Class b and should be equivalent to at least Chemical GQA Class: B. The extent and diversity of bankside refuges should be maintained. Overhanging vegetation should be present intermittently along the east, north and west banks throughout the year. This should cover 60% of the bank length, distributed in patches along the bank. The southern bank is open grassland. A fringe of marginal vegetation 1-4m wide should be present along at least 10% of the bank sides and submerged macrophytes should cover 10 to 20% of the pool from June to September. The extent and diversity of the site's substrates should be maintained and non-native crayfish species should be absent from the waterbody and their catchments.

Appendix 3: Flooding map and the River Mease Catchment map

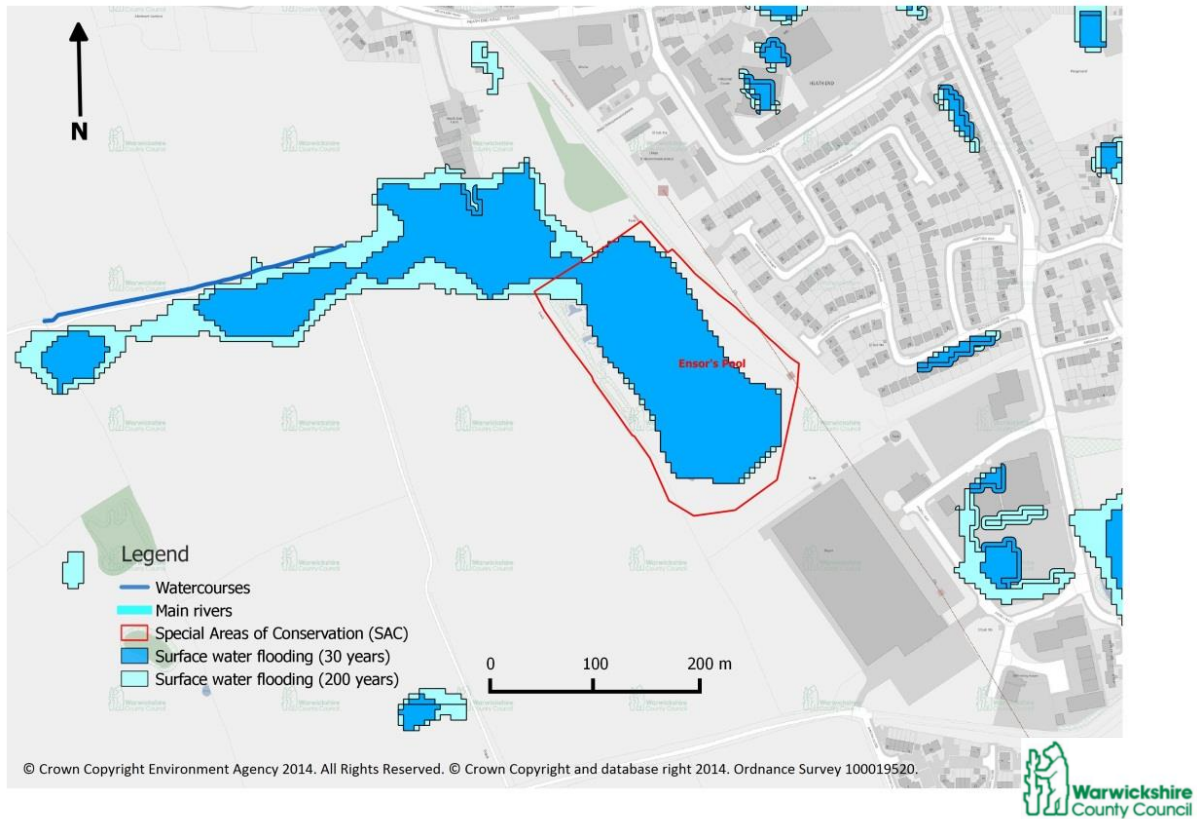


Figure 9: Ensor's Pool and surface water flooding predictions for 30 years and 200 years

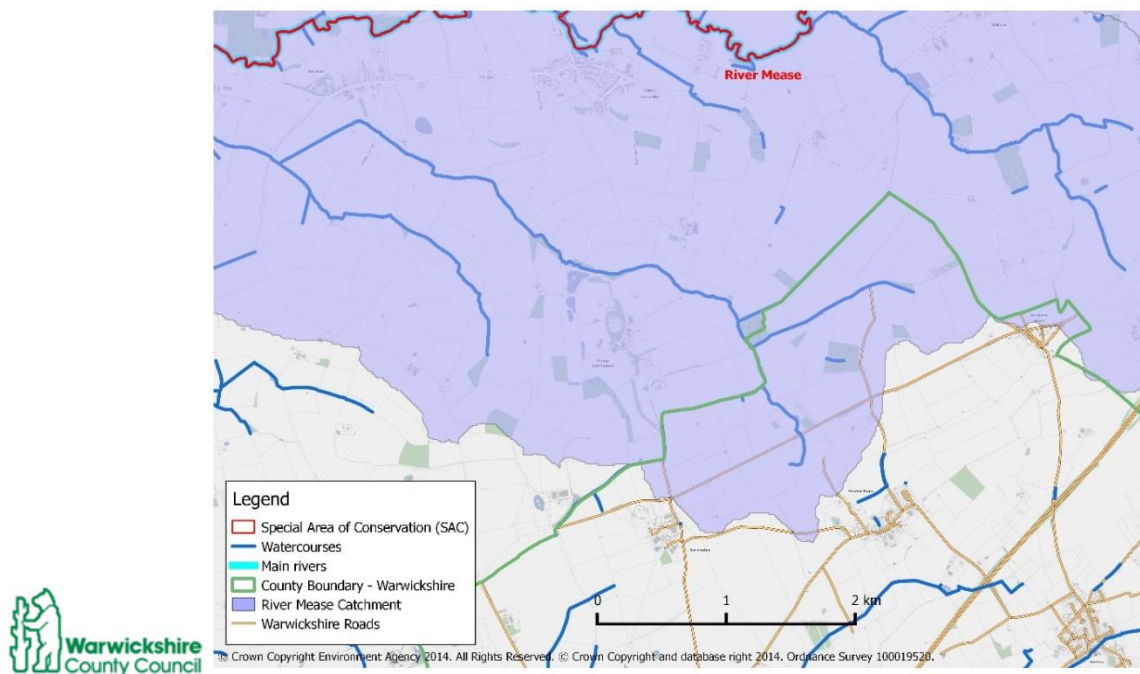


Figure 10: River Mease catchment area

Appendix 4: Results of the screening of policies in the Coventry Local Plan and Coventry City AAP

4.1 Screening for Coventry Local Plan

Content of plan	Screening conclusion	Screening Category	Justification
Contents and Abbreviations	Screened out		Administrative text
Introduction, Purpose and role of the Draft Plan, Background, National Guidance, The Duty to Cooperate, Issues and Opportunities	Screened out		Administrative Text and Background information on the plan
Vision Strategy and Objectives - Local Plan Objectives 1 to 9	Screened out	A	General Statement of Policy / general aspiration. General statements of broad objectives the implications of which are considered in Sections 1 to 13 of the plan.
Community and Stakeholder Engagement	Screened out		Administrative text
Section 1: Overall Levels of Growth and Duty to Co-operate			
Introduction	Screened out		Administrative text – introductory text about the plan
Housing Need, Employment Land Needs, Retail Floor Space Needs	Screened out		Introductory text the outcomes of which are assessed under Policy DS 1: Overall Development Need
Policy DS1: Overall Development Needs	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines the key levels of development proposed as part of the new Coventry Local Plan as outlined in Section 1.1. Given that no functional pathways to impact European Sites have been identified (see Table 5 and Section 3.4.3), then this policy can be screened out. The last section of the policy acknowledges the shortfall of 17 000 homes and 241 ha of employment land which will need to be delivered by neighbouring Councils through the Duty to Cooperate. When agreed, neighbouring Districts and Boroughs will need to incorporate these additional houses into their specific local

			plans which will require their own HRAs. See Section 3.5.1.
Duty to Cooperate	Screened out	A	Background information on the Duty to Cooperate
Policy DS 2: The Duty to Cooperate	Screened out	C	Policy outlines CCC's commitment to work with neighbouring authorities to support the development outlined in Policy DS1 (above). This policy is deemed to fall in category C as the policy refers to development proposed in Policy DS 1 without proposing it. As specified above and in Section 3.5.1 an HRA for any additional houses to be delivered outside of Coventry will be outlined in the relevant neighbouring authority or districts own local plan and will require their own HRA.
Delivering Sustainable Development	Screened out		Introductory text
Policy DS3: Sustainable Development Policy	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Section 2: Health and Wellbeing			
Relevant Evidence Base, Introduction, Background, Being a Marmot City, Health Impact Assessments	Screened out		Administrative / Background text
Policy HW1: Health Impact Assessments	Screened out	G	Policy or proposal that could not have any conceivable effect on a site
Text below HW1	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Section 3: Jobs and Economy			
Relevant Evidence Base, Introduction	Screened out		Administrative / Background text
Policy JE1: Overall Economy and Employment Strategy	Screened out	A	General statement of policy / general aspiration. The policy sets out the overall strategy for economy and employment over the plan period
Text Below JE1	Screened out		Introductory text / background text on wider issues around employment
Provision of Employment Land and Premises	Screened out		Background text provides the details on the requirement for employment land in Coventry and how it will be delivered through allocations in Policy JE 2
Policy JE2: Provision of Employment Land and Premises	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives

			(either alone or in combination with other aspects of this or other plans or projects). The policy outlines a commitment to 101ha to be allocated to employment as part of the plan but development of this nature if not considered to have an LSE on any European Sites as no functional pathways have been identified (see Table 5)
Text below Policy JE2	Screened out		Background text supporting policy JE2
Non-Employment Uses on Employment Land	Screened out		Background text for policy JE3
Policy JE3: Non-Employment Uses on Employment Land	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Text below Policy JE3	Screened out		Background text for Policy JE3
Location of New Office Development	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Policy JE4 : Location of Office Development	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals. Development of this nature is not considered to have any LSE on any European Sites
Text below Policy JE 4	Screened out		Further criteria / background information assessed under Policy JE4
Location of New R&D, Industrial and Storage / Distribution Development	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Policy JE5: Location of R&D, Industrial and Storage/Distribution Development	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals. Development of this nature if not considered to have any LSE on any European Sites
Tourism/Visitor Related Development	Screened out	A	General Statement of policy / general aspiration
JE6: Tourism/ Visitor Related Development	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Accessibility to Employment Opportunities	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Policy JE7: Accessibility to Employment Opportunities	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals

Text below JE7	Screened out	A	General Statement of policy / general aspiration
Section 4: Delivering Coventry's Housing Needs			
Relevant Evidence Base, Introduction, The Overarching Housing Strategy, Scale of Housing Development	Screened out		Background text on what the housing forecast and agreed levels of housing for the local plan are based on and highlights the fact that not all of the homes in the OAN assessment ' <i>can be delivered within the city's boundaries</i> '. Implications of this are assessed under Policy DS1
Policy H1: Housing Land Requirements	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This policy outlines the commitment to minimum of 24 600 dwellings over the plan period (2011 to 2031) and provides per annum commitments to house building. Given that no functional pathways to impact European Sites have been identified (see Table 5 and Section 3.4.3), this policy can be screened out
Text below Policy H1	Screened out		Background information to support policy H1 and H2
Policy H2: Housing Allocations	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). Policy provides details of proposed housing allocations many of which are illustrated in Figure 1. No functional pathways to impact European Sites have been identified so this policy can be screened out
Location of Additional Housing Development	Screened out		Background text to support Policy H3
Policy H3: Provision of New Housing	Screened out	B	Policies listing general criteria for testing the acceptability / sustainability of proposals
Text below Policy H3	Screened out		Further background text to support Policy H3
Securing a Mix of Housing	Screened out		Background text to support Policy H4
Policy H4: Securing a Mix of Housing	Screened out	B	Policies listing general criteria for testing the acceptability / sustainability of proposals
Securing a Mix of Housing Cont.	Screened out		Background text to support Policy H4

Managing the existing housing stock	Screened out		Background text to support Policy H4
Policy H5: Managing Existing Housing Stock	Screened out	B	Policies listing general criteria for testing the acceptability / sustainability of proposals
Managing the existing housing stock Cont.	Screened out		Background text to support Policy H4
'Affordable Housing'	Screened out		Background text highlighting the need for affordable housing in Coventry and how the need will be met
Policy H6: Affordable Housing	Screened out	B	Policies listing general criteria for testing the acceptability / sustainability of proposals
'Affordable Housing' Cont.	Screened out		Background text highlighting the need for affordable housing in Coventry and how the need will be met
Gypsies and Travellers			Background text to policy H7 including latest guidance and need within Coventry
Policy H7: Gypsy and Traveller Accommodation	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). Policy provides details of the provision of at least 16 permeant pitches for Gypsies and Travellers and other criteria for which applications for such development will be tested. No functional pathways have been identified so no LSE are anticipated
Gypsies and Travellers Cont.			Text makes reference to implications of Policy H3
Care homes, Supported Housing, Nursing Homes and Older Persons accommodation	Screened out		Background text on the projections for the need for these services throughout the plan period
Policy H8: Care Homes, Supported Housing, Nursing Homes & Old Persons Accommodation	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Care homes, Supported Housing, Nursing Homes and Older Persons accommodation Cont.	Screened out		Background text on the projections for the need for these services throughout the plan period
Residential Density	Screened out		Background text for policy H9

Policy H9: Residential Density	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). Policy provides the minimum densities of housing for proposed developments within the plan period. None of the initial consultations with Natural England, Severn Trent Water or the Environment Agency have highlighted concerns regarding the increased housing densities from previous versions of the local plan, no functional pathways have been identified so no LSEs are anticipated
Student Accommodation	Screened out		Background text to policy H10
Policy H10: Student Accommodation	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Student Accommodation Cont.	Screened out		Background text to policy H10
Homes in Multiple Occupation (HiMO's)	Screened out		Background text to policy H11
Policy H11: Homes in Multiple Occupation (HiMO's)	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Homes in Multiple Occupation (HiMO's) Cont.	Screened out		Background text to policy H11
Section 5: Retail and Town Centre Uses			
Relevant Evidence Base, Introduction, Coventry's Retail Needs	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). This section provides the background to policy R1
Policy R1: Delivering Retail Growth	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). Policy provides details of the sites and areas allocated ' <i>to support the provision of retail floor space across Coventry.</i> '
Coventry's Retail Needs Cont.	Screened out		Background text / supporting information for Policy R1

Other Town Centre Needs	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). Text provides details of other uses e.g. Leisure, entertainment facilities, offices and arts, culture and tourism development
Coventry's Centres Hierarchy	Screened out		Background information
Policy R2: Coventry City Centre-Development Strategy	Screened out	A	General Statement of Policy / general aspiration. The policy also makes reference to Coventry's Area Action Plan that has been independently screened for LSE in Table 8 below
Coventry's Centres Hierarchy Cont.	Screened out		Background information
Policy R3: The Network of Centres	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
Out of Centre Proposals	Screened out		Background text to support Policy R4
Policy R4: Out of Centre Proposals	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Out of Centre Proposals Cont.	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals and background information
Retail Frontages and Ground Floor Units in defined centres	Screened out		Background text to support Policy R5
Policy R5: Retail Frontages Ground Floor Units in defined centres	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals.
Retail Frontages and Ground Floor Units in defined centres. Cont.	Screened out		Background text to support Policy R5
Restaurants, bars and Hot Food Takeaways	Screened out		Background text to support Policy R6
Policy R6: Restaurants, bars and Hot Food Takeaways	Screened out	G	Policy or proposal that could not have any conceivable effect on a site

Restaurants, bars and Hot Food Takeaways. Cont.	Screened out		Background text to support policy R6
Section 6: Communities			
Relevant Evidence Base, Introduction, New or improved social and community premises, Local Health Provisions, Cultural and Community Buildings, Universities, Schools and Educational Facilities	Screened out		Background information to support policy CO1
Policy SO1: New or improved social community and leisure premises	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Universities, Schools and Educational Facilities Cont.	Screened out		Further background information supporting policy CO1 including criteria for consideration
Re-use of or Re-development of Facilities	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Policy CO2: Re-use of or Redevelopment of Facilities	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Re-use of or Re-development of Facilities Cont.	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals. Supporting text for policy CO2.
Neighbourhood and Community Planning	Screened out		Background information to support Policy CO3
Policy CO3: Neighbourhood and Community Planning	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). Policy provides details relating to the preparation of neighbourhood and community plans including designation of land or buildings as assets of community value
Neighbourhood and Community Planning Cont.	Screened out	B	Supporting text for policy CO3
Section 7: Green Belt and Green Environment			

Relevant Evidence Base, Introduction, Green Belt, Coventry's Very Special Circumstances	Screened out		Background text to Section 7
Policy GB1: Green Belt and Local Green Space	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). Policy outlines changes to the green belt proposed as part of the plan. No functional pathways from European Sites to proposed development in Coventry has been identified, hence no LSE are anticipated and this policy is screened out
Coventry's Very Special Circumstances Cont., Designation of Local Green Space, Reserved land in the green belt	Screened out		Background text for policies GB 1 and GB 2
Policy GB2: Reserved Land in the Green Belt	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Reserved Land in Green Belt Cont.	Screened out		Background text to support policy GB2
Green Environment	Screened out		Background text to support policy GE1
Policy GE1 Green Infrastructure	Screened out	D	Environmental protection / site safeguard policy
Green Environment Cont.	Screened out		Background text to support policy GE1
Formal Green Space, Informal Green Space, Functional Green Space	Screened out		Background text to support policy GE2
Policy GE2: Green Space	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals.
Functional Green Space Cont.	Screened out		Provides background text for policy GE2
Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation	Screened out	D	Environmental protection / site safeguard policy
Explanation for policy GE3	Screened out	D	Environmental protection / site safeguard policy

Policy GE4: Tree Protection	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Explanation for policy GE3	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Section 8: Design			
Relevant Evidence Base, Introduction, High Quality Design	Screened out		Provides background information for policy DE1
Policy DE1: Ensuring High Quality Design	Screened out	D	Environmental protection / site safeguard policy
Explanation for Policy DE1	Screened out		Provided further background information and criteria relevant to policy DE1
Section 9: Heritage			
Relevant Evidence Base, Introduction, Conservation Areas	Screened out		Background information for policy HE1
Policy HE1: Conservation Areas	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
Conservation and Heritage Assets	Screened out		Background information for policy HE2
Policy HE2: Conservation and Heritage Assets	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Conservation and Heritage Assets Cont.	Screened out	B	Policy / supporting text listing general criteria for testing the acceptability / sustainability of proposals
Heritage Park - Charter house	Screened out		Background information for policy HE3
Policy HE3: Heritages Park - Charterhouse	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). The Environment Agency in initial consultations have not raised any concerns regarding these proposals in terms of this HRA
Section 10: Accessibility			
Relevant Evidence Base, Introduction, Public Health and Air Quality, Strategic Connectivity, An Accessible Transport Network, Transport Infrastructure	Screened out		Reference to: Air Quality Issues: Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). As per Table 5, it is considered that the distance of Ensor's Pool from the

Hierarchy, Equality and Choice, Intelligent Mobility			Coventry boundary (approximately 7km) means that no LSE to Ensor's Pool from any air pollution impacts from Ensor's Pool are anticipated, normally considered relevant within 2km (see Table 5). All the remainder of this section provides background information on accessibility in Coventry to support policy AC1
Policy AC1: Accessible Transport Network	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Local Road Network, Impact of Growth on the Road Network	Screened out		All provides background information to support policy AC2
Policy AC2: Road Network	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Network and Demand Management	Screened out		Background text for policy AC3
Policy AC3: Demand Management	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Walking and Cycling, Cycling, Walking	Screened out		Background text for policy AC4
Policy Acc4: Walking and Cycling	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
Public Transport	Screened out		Background text on public transport issues
Policy AC: Bus and Rapid Transit	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
Rail Services, High Speed Rail (HS2) and West Coast Main Line (WCML)	Screened out		Background text on rail service issues to support policy AC6
Policy AC6: Rail	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
Freight	Screened out		Background text on freight
Policy AC7: Freight	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives

			(either alone or in combination with other aspects of this or other plans or projects).
Section 11: Environmental Management, Minerals and Waste			
Relevant Evidence Base, Introduction, Planning for Climate Change	Screened out		Provides background information on Coventry's Climate Change Strategy
Policy EM1: Planning for Climate Change Adaptation	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Explanation for Policy EM1.	Screened out		Background to Policy EM 1
Policy EM2: Building Standards	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Explanation for Policy EM2.	Screened out		Background to Policy EM 2
Policy EM3: Renewable Energy Generation	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Explanation of policy EM3.	Screened out		Background to Policy EM 3
Water Quality and Flood Risk	Screened out		Background to the Councils Local Flood Risk Management Strategy and Surface Water Management Plan
Policy EM4: Flood Risk Management	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Explanation for policy EM4	Screened out		Background to Policy EM 4
Policy EM5 Sustainable Urban Drainage Systems (SuDS)	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Explanation for policy EM5	Screened out		Background to Policy EM 5
Air Quality	Screened out		Background to Policy EM6
Policy EM6 Air Quality	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Explanation for policy EM6	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). As per Table 5, it is considered that the distance of Ensor's Pool from the Coventry boundary (approximately 7km) means that no LSE to Ensor's Pool from any air pollution impacts from proposed development in the Local Plan are

			anticipated, normally considered relevant within 2km (see Table 5)
Minerals and Waste Introduction, Waste Management	Screened out		Background on current municipal waste issues to support policy EM7
Policy EM7 Waste Management	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Waste Management cont., New Waste Management Facilities	Screened out		Background on current issues around existing waste management facilities with the acknowledgement that <i>'there is no opportunity for existing or future development landfill capacity in the City. Therefore the city will continue to rely upon landfill in surrounding authorities for the life of the Plan period.'</i> However this is not considered to have any impact on European Sites currently so has been screened out
Safeguarding Mineral Resources	Screened out		Background information to support policy EM 8
Policy EM8 Safeguarding Mineral Resources	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Explanation	Screened out		Background information for policy EM8
Section 12: Connectivity – Telecommunications, Broadband and Mobile Internet			
Relevant Evidence Base, Introduction, Broadband Connectivity Introductory text	Screened out		Provides background on the issues surrounding e-infrastructure in Coventry
Policy C1: Broadband and Mobile Internet.	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
Supporting text for policy C1	Screened out	A	General Statement of policy / general aspiration
Telecommunications	Screened out		Background information
Policy C2: Telecommunications	Screened out	D	Environmental protection / site safeguard policy. This policy specifically states that any development in an area of ecological interest should not have any unacceptable effects
Text supporting policy C2	Screened out		Supporting information for policy C2
Section 13: Implementation and Infrastructure Delivery Plan			
Introduction, Delivery of infrastructure,	Screened out		Background on policy requirements for infrastructure

Infrastructure Requirements.			
Policy IM1: Developer Contributions for Infrastructure	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Infrastructure Requirements Cont., Implementation, Local and National Grant Funding, Developer Contributions, Inward Investment, Partnership working, Duty to Cooperate, Use of Council powers, Monitoring and Performance.	Screened out		Background information and policy to support policy IM1
Appendix 1: Housing Trajectory	Screened out		Background information to support policy DS1
Appendix 2: Marketing Guidance to Support Policies JE3 and CO2	Screened out		Background information to support policies JE3 and CO2
Appendix 3: Ancient Woodlands Inset Map	Screened out		Background information to support policy GE3
Appendix 4: Heritage Park and Connectivity Route Inset Map	Screened out		Background information to support policy HE3
Appendix 5: Car and Cycle Parking Standards for New Development	Screened out		Background information to support Section 10 of the Coventry Local Plan
Appendix 6: Replacement of Coventry Development Plan Saved Policies by local Plan	Screened out		Background information to support the plan
Appendix 7: Infrastructure Delivery Plan	Screened out		Contains background information to support the plan. In reference to 'Water Supply and Sewerage capacity' the Appendix states that ' <i>there is capacity to support growth across Coventry but the water environment and water services infrastructure cannot support all of the development in the proposed allocations until further investigations and upgrades</i>

			<i>have been completed. There are some areas such as the City Centre, where growth is largely unconstrained by the water environment but there are others such as the SUE's [Sustainable Urban Extensions] which have some level of constraint and will require on-going collaborative working between the Council, Environment Agency and Severn Trent Water to resolve.'</i> Whilst no specific policy is present in the plan on this, our consultation with Severn Trent Water and the Environment Agency has not highlighted any concerns regarding the supply of water for Coventry Local Plan and any LSE to European Sites
Appendix 8: Monitoring Framework	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Appendix 9: Glossary of Key Terms	Screened out		Administrative Text / Background Text
Policies Map	Screened out		Map supporting the policies in the Local Plan
Coventry Local Development Scheme June 2015/ July 2014	Screened out		Background / supporting information
Local Plan Summary Report	Screened out		Background / supporting information on the results of the consultation responses between September and October 2014

Table 7: Screening matrix for the Coventry Local Plan

4.2 Screening of the Coventry City AAP

Content of plan	Screening conclusion	Screening Category	Justification
Contents, Glossary of Key terms	Screened out		Administrative Text
1. Introduction	Screened out		Introductory Text
2. Background	Screened out		Introductory Text
3. Where is the City Centre Now?	Screened out		Introductory Background Text
4. Developing the city Centre			
4.1 The City Centre Vision and Objectives	Screened out		Introductory text
Policy CC1: Coventry City Centre – Development Strategy	Screened out	A	General Statement of Policy / general aspiration
4.2 to 4.17	Screened out		Background Supporting Information
5. Health and Wellbeing within the City Centre	Screened out	A	General Statement of Policy / general aspiration and background supporting information
6. Infrastructure and Implementation	Screened out	C	Proposal referred to but not proposed by the plan
7. Alternative Options	Screened out		Background Supporting Information including information on alternative options through the SA/SEA
8. Evidence Base	Screened out		Background information
9. Community and Stakeholder Engagement	Screened out		Background information
City Centre Heritage	Screened out		Background Information
Policy CC2: Enhancement of Heritage Assets	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Built Environment and Building Design	Screened out		Background supporting information
Policy CC3: Building Design	Screened out	F	Policy that cannot lead to development or other change
Public Art	Screened out		Introductory text
Policy CC4: Public Art	Screened out	E	Policies or proposals that could not have any conceivable effect on a site

Lighting	Screened out		Introductory text
Policy CC5: Lighting	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
Public Realm	Screened out		Background information and introductory text
Policy CC6: Public Realm	Screened out	E	Policies or proposals that could not have any conceivable effect on a site
Tall Buildings and Views of the Three Spires	Screened out		Background information
Policy CC7: Tall Buildings	Screened out	E	Policies or proposals that could not have any conceivable effect on a site
The Natural Environment & Green and Blue Infrastructure	Screened out		Background information
Policy CC8: Green and Blue Infrastructure	Screened out	D	Environmental Protection / Site Safeguard Policy
Water Quality & Drainage & Flood Risk	Screened out		Background information
Policy CC9: Drainage & Flood Risk	Screened out	D	Environmental Protection / Site Safeguard Policy
Environmental Management	Screened out		Background information
Policy CC10: Environmental Management	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Accessibility	Screened out		Background information
Policy CC11: Accessibility	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
The City Centre Areas & The Business Area - Friargate	Screened out		Background information
Policy CC12	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
Cathedrals and Cultural Areas	Screened out		Background Information
Policy CC13	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot

			undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
The Civic Area	Screened out		Background Information
Policy CC14	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
Far Gosford Street Area	Screened out		Background information
Policy CC15	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
Health and Education Area – Swanswell	Screened out		Background information
Policy CC16	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
Leisure and Entertainment Area	Screened out		Background information
Policy CC17	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
Primary Shopping Area	Screened out		Background information
Policy CC18	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
Policy CC19	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)

Policy CC20	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
Policy CC21	Screened out	G	Policy or proposal that could not have any conceivable effect on a site
Primary and Secondary Frontages	Screened out		Background information
Policy CC22	Screened out	G	Policy or proposal that could not have any conceivable effect on a site
Technology Park Area – Parkside	Screened out		Background information
Policy CC23	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
University and Enterprise Area	Screened out		Background information
Policy CC24	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals
Regeneration Areas	Screened out		Introductory text
The Bishop Street Regeneration Area	Screened out		Background Information
Fairfax Street Regeneration Area	Screened out		Background Information
Policy CC25: Regeneration Areas	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
The Warwick Row Area	Screened out		Background Information
Policy CC26: The Warwick Row Area	Screened out	H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
Appendix 1: Primary Frontages within the Primary Shopping Area	Screened out		Background / supporting information
Appendix 2: Monitoring Framework	Screened out	B	Policy listing general criteria for testing the acceptability / sustainability of proposals

City Centre Area Action Plan Summary Report	Screened out		Background / supporting information on the results of the consultation responses between February and April 2015
--	--------------	--	--

Table 8: Screening matrix for Coventry City AAP

Appendix 5: Template for recording the conclusion of the Habitat Regulations Assessment

Extract from the HRA Handbook 2013

RECORD FOR A PLAN WHICH WOULD NOT BE LIKELY TO HAVE A SIGNIFICANT EFFECT ON ANY EUROPEAN SITE, EITHER ALONE OR IN COMBINATION WITH ANY OTHER PLAN OR PROJECT

Introduction and conclusion of the assessment

The *[enter title of plan]* was considered in light of the assessment requirements of regulation 61 of the Conservation of Habitats and Species Regulations 2010 by *[enter name of plan-making body]* which is the competent authority responsible for adopting the plan and any assessment of it required by the Regulations.

Having carried out a 'screening' assessment of the plan, the competent authority has concluded that the plan would not be likely to have a significant effect on any European site, either alone or in combination with any other plans or projects (in light of the definition of these terms in the 'Waddenzee' ruling of the European Court of Justice Case C – 127/02) and an appropriate assessment is not therefore required.

[Enter name of SNCB] was consulted on this conclusion and has *[agreed / disagreed]*. Any relevant written responses are appended and referred to below.

Information used for the assessment

A copy of the list used to scan for and select European sites potentially affected by the plan is appended as *[Enter an appropriate reference to a scanning and site selection list based on that given as an example in Figure F.4.4 in the Handbook]*

A summary of the information gathered for the assessment is presented in the Information Required for Assessment table, which is appended as *[Enter an appropriate reference to a table or schedule based on that given as an example in Figure D.1.1 in the Handbook]*.

The screening of the plan

A summary of the outcomes of the screening process is given in the screening schedule below (and re-screening schedule where relevant), which is appended as *[Enter appropriate reference to a schedule based on those given as examples in F.6 of the Handbook]*

Mitigation measures

In reaching the conclusion of the assessment the competent authority took the following mitigation measures into account:

[Enter list which could be based on F.7 of the Handbook, or refer to appended document]

Assumptions and limitations

The screening conclusion necessarily relies on some assumptions and it was inevitably subject to some limitations. Most of the assumptions and limitations would not affect the conclusion but the following points are recorded in order to ensure that the basis of the assessment is clear.

[Enter list of assumptions and limitations that have the potential to affect the assessment conclusions if circumstances materially change]

References and reports

In reaching the conclusion of the assessment the competent authority took the following documents into account:

[Enter list of references and / or links to any supporting documentation or reports with dates as appropriate]

Further supplementary information [*is not required / is appended*]

Dated: [enter a date]

Copy sent to [*select appropriate body*] on [enter a date]

Extract from The Habitats Regulations Assessment Handbook, www.dtapublications.co.uk © DTA Publications Limited (September) 2013 all rights reserved. This work is registered with the UK Copyright Service.