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Sent: 26 April 2022 12:26
To: Levine, Cody <CLevine@worcestershire.gov.uk>; Burlachka, Yana <Yana.Burlachka@naturalengland.org.uk>
Cc: Aldridge, Steven <SAldridge@worcestershire.gov.uk>
Subject: [EXTERNAL]RE: Urgent - Lea Castle Farm Quarry HRA screening - Info for consideration

Hi All,

I can do 16:00. I am in meeting from 14:30 but will leave for 16:00 start.

As 'heads up' and to hopefully allow you a little time for reflection before 16:00 here are the main points I propose we cover following my brief read through the HRA screening this morning:

- Functionally linked land - Severn estuary SPA birds
 - Update – the final publication version of the relevant report references Upton Warren as the northernmost site subject to assessment. I doubt this alters your HRA narrative and conclusions on this theme but it represents a factual correction you may want to consider.
- Functionally linked watercourses – Severn Estuary SAC/Ramsar Site migratory fish
 - The HRA screening does not appear to consider the Ramsar Site species. I have checked the Environment Agency's Ecology and Fish Data explorer website and attach a screenshot showing locations (blue dots) for these species in the Kidderminster area (2017-22). Species recorded include Atlantic salmon, sea/brown trout, lamprey sp. larvae and European eel (elvers and glass eels).
- Key consideration is water quality. Two strands of thought here to consider:
 - Conscious of sand and gravel quarry design and normal practice regarding use settlement lagoons and associated water pollution prevention arrangements. For hRA purposes you will need to reach a view on whether this approach (if it applies at Lea Castle) can be treated as embedded mitigation.
 - To help further in establishing the HRA related mitigation 'goalposts' we offer the following advice on the use of Water Framework Directive status:

Outside of the protected site's boundary, Natural England generally deems Water Framework Directive (WFD) 'good ecological status' (GES) to be of a sufficient quality to maintain habitat suitable for fish species forming part of the notification of the Severn Estuary SAC and Ramsar Site. This is because WFD site standards are calculated on the basis of the environmental attributes of watercourses which will similarly tend to govern which species of fish are present. Consistent with this, the standard for WFD GES may be regarded as adequately stringent to protect the natural fish assemblage and ecological community in general. As a result, ensuring that any plan or project will not cause the deterioration of the site from GES, or otherwise prevent the site from reaching GES, is deemed to be an acceptable approach for maintaining and restoring populations of notified fish species outside of the SAC/Ramsar Site's boundary.

See you later this afternoon.

Kind regards,

Antony

2. Draw an area

FW Fish
FW Invertebrates
FW Macrophytes
FW Diatoms