



# Cannock Chase Local Plan

## HRA Report

### Cannock Chase District Council

**Final report**

Prepared by LUC

March 2021

Version	Status	Prepared	Checked	Approved	Date
1	Draft for client comment	K Sydney R Turner N Gilbert	T Livingston	T Livingston	01.03.2021
2	Final report	K Sydney	K Moroney	T Livingston	17.03.2021



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# Chapter 1

## Introduction

1.1 LUC has been commissioned by Cannock Chase District Council (CCDC) to carry out a Habitat Regulations Assessment (HRA) of its Local Plan.

## Background to the preparation of the Cannock Chase Local Plan

1.2 CCDC began work on its new Local Plan in February 2018. An Issues & Scope paper was published for consultation in summer 2018, followed by an Issues & Options consultation in summer 2019. The Issues & Options consultation was accompanied by a HRA Scoping Report, prepared by LUC, which set out the proposed methodology of the HRA and key assumptions that would underpin the assessment.

1.3 CCDC has now produced a Local Plan Preferred Options (February 2021) document, which includes draft policies and site allocations; this HRA report sets out the assessment of these. This HRA report will be subject to consultation alongside the Local Plan Preferred Options document.

## The requirement to undertake Habitats Regulations Assessment of Development Plans

1.4 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007 [[See reference 1](#)]; the currently applicable version is the Habitats

Regulations 2017 [See reference 2], as amended. When preparing development plans, CCDC is therefore required by law to carry out an HRA. The Council can commission consultants to undertake HRA work on its behalf and this (the work documented in this report) is then reported to and considered by CCDC as the 'competent authority'. The Council will consider this work and would usually [See reference 3] only progress a Plan if it considers that the Plan will not adversely affect the integrity [See reference 4] of any 'European site', as defined below. The requirement for authorities to comply with the Habitats Regulations when preparing a Plan is also noted in the Government's online Planning Practice Guidance [See reference 5] (PPG).

**1.5** HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: SPAs and SACs. These were classified under European Union (EU) legislation but, since 1 January 2021, are protected in the UK by the Habitats Regulations 2017 (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated for particular habitat types (specified in Annex 1 of the EU Habitats Directive [See reference 6]) and species (Annex II).
- SPAs are classified for rare and vulnerable birds (Annex I of the EU Birds Directive [See reference 7]), and for regularly occurring migratory species not listed in Annex I.

**1.6** The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites [See reference 8] and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper [See reference 9] on changes to the Habitats Regulations 2017 post-Brexit states that:

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new 'national site network'.
- The national site network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations.

- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats.

**1.7** Although Ramsar sites do not form part of the new national site network, the Government Policy Paper [See reference 10] confirms that all Ramsar sites remain protected in the same way as SACs and SPAs. In LUC's view and unless the Government provides any guidance to the contrary, potential effects on Ramsar sites should continue to form part of the HRA of plans and projects since the requirement for HRA of plans and projects that might adversely affect Ramsar sites forms an essential part of the protection confirmed by the Government Policy Paper. Furthermore, the NPPF [See reference 11] and practice guidance [See reference 12] currently still state that competent authorities responsible for carrying out HRA should treat Ramsar sites in the same way as SACs and SPAs.

**1.8** The requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves; therefore, for clarity, this report uses the term 'European sites' rather than 'national site network'.

**1.9** The overall purpose of the HRA is to conclude whether or not a proposal or policy, or whole development plan would adversely affect the integrity of the site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

# Stages of Habitats Regulations Assessment

**1.10** The remainder of this chapter summarises the stages involved in carrying out a HRA based on various guidance documents [See reference 13], [See reference 14]. This HRA presents the methodology and findings of Stage 1: Screening.

## Stage 1: Screening (the "Significance test")

### Task

Description of the development plan and confirmation that it is not directly connected with or necessary to the management of European sites.

Identification of potentially affected European sites and their conservation objectives [See reference 15].

Review of other plans and projects.

Assessment of likely significant effects of the development plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction ('mitigation') measures [See reference 16].

### Outcome

Where effects are unlikely, prepare a 'finding of no significant effect report'.

Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.

## Stage 2: Appropriate Assessment (the ‘Integrity Test’)

### Task

Information gathering (development plan and data on European sites [**See reference 17**]).

Impact prediction.

Evaluation of development plan impacts in view of conservation objectives of European sites.

Where impacts are considered to directly or indirectly affect qualifying features of European sites, identify how these effects will be avoided or reduced (‘mitigation’).

### Outcome

Appropriate Assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided through, firstly, avoidance, and secondly, mitigation including the mechanisms and timescale for these mitigation measures.

If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.

## Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation

### Task

Identify and demonstrate 'imperative reasons of overriding public interest' (IROPI).

Demonstrate no alternatives exist.

Identify potential compensatory measures.

### Outcome

This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

**1.11** In assessing the effects of the Local Plan in accordance with Regulation 105 of the Habitats Regulations (as amended), there are potentially two tests to be applied by the competent authority: a 'Significance Test', followed, if necessary, by an Appropriate Assessment which will inform the 'Integrity Test'. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not –
- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on the site, either alone or in combination with other plans or projects (the 'Significance Test'). [These two steps are undertaken as part of Stage 1: Screening shown in Table 1.1 above.] If Yes –

- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public. [This step is undertaken during Stage 2: Appropriate Assessment shown in Table 1.1.]
- Step 4: In accordance with Reg.105(4), but subject to Reg.107, give effect to the land use plan only after having ascertained that the plan will not adversely affect the integrity of the European site.

**1.12** It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the avoidance of likely significant effects at Stage 1, and through Appropriate Assessment at Stage 2 by the inclusion of mitigation measures designed to avoid, reduce or abate effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with both the Government and European Commission.

**1.13** The HRA should be undertaken by the 'competent authority' - in this case CCDC, and LUC has been commissioned to do this on its behalf. The HRA also requires close working with Natural England as the statutory nature conservation body in order to obtain the necessary information and agree the process, outcomes and any mitigation proposals.

## Case law

**1.14** This HRA has been prepared in accordance with relevant case law findings, including most notably the 'People over Wind' and 'Holohan' rulings from the Court of Justice for the European Union (CJEU).

**1.15** The People over Wind, Peter Sweetman v Coillte Teoranta (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an Appropriate Assessment and should not be taken into account at the screening stage. The precise wording of the ruling is as follows:

“Article 6(3) .....must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.”

**1.16** In light of the above, the HRA screening stage does not rely upon avoidance or mitigation measures to draw conclusions as to whether the Local Plan could result in likely significant effects on European sites, with any such measures being considered at the Appropriate Assessment stage as relevant.

**1.17** This HRA also fully considers the Holohan v An Bord Pleanala (November 2018) judgement which stated that:

Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an ‘appropriate assessment’ must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that, where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the 'appropriate assessment' must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.

**1.18** In undertaking this HRA, LUC considers the potential for effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of European sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and or species and habitats located beyond the boundaries of European site, but which may be important in supporting the ecological processes of the qualifying features, has also been fully considered in this HRA.

**1.19** The approach to the HRA also takes into consideration the 'Wealden' judgement and the 'Dutch Nitrogen Case' judgements from the Court of Justice for the European Union.

**1.20** Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority (2017) ruled that it was not appropriate to scope out the need for a detailed assessment for an individual plan or project based on the annual average daily

traffic (AADT) figures detailed in the Design Manual for Roads and Bridges or the critical loads used by Defra or Environmental Agency without considering the in-combination impacts with other plans and projects.

**1.21** In light of this judgement, the HRA therefore considers traffic growth based on the effects of development from the Local Plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

**1.22** The 2018 ‘Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu (Dutch Nitrogen)’ judgement stated that:

“...the positive effects of the autonomous decrease in the nitrogen deposition...be taken into account in the appropriate assessment..., it is important that the autonomous decrease in the nitrogen deposition be monitored and, if it transpires that the decrease is less favourable than had been assumed in the appropriate assessment, that adjustments, if required, be made.”

**1.23** The Dutch Nitrogen judgement also states that according to previous case law:

“...it is only when it is sufficiently certain that a measure will make an effective contribution to avoiding harm to the integrity of the site concerned, by guaranteeing beyond all reasonable doubt that the plan or project at issue will not adversely affect the integrity of that site, that such a measure may be taken into consideration in the ‘appropriate assessment’ within the meaning of Article 6(3) of the Habitats Directive.”

**1.24** The HRA of the Local Plan therefore only considers the existence of conservation and/or preventative measures if the expected benefits of those measures are certain at the time of the assessment.

## Previous HRA work

**1.25** Cannock Chase's current development plan, Local Plan (Part 1), was adopted in 2014 and was subject to HRA. The HRA report recommended mitigation measures in the form of a developer contributions scheme to fund access management measures to offset the impact of 78,000 new houses identified within the Local Plan policies of the planning authorities within the 0-15km Zone of Influence of Cannock Chase SAC. With these mitigation measures, the previous HRA ruled that an adverse effect on the integrity of Cannock Chase SAC arising from the residential development set out in the adopted Cannock Chase Local Plan (Part 1) could be ruled out.

**1.26** An Issues and Options consultation for the Local Plan (Part 2) took place in 2017. Following that consultation the Council decided that, rather than continuing with the preparation of the Local Plan (Part 2) as originally intended, a full new Local Plan would instead be prepared which would also replace the adopted Local Plan (Part 1).

**1.27** LUC completed a HRA Scoping Report of the new CCDC Local Plan in January 2019. The Scoping Report (2019) identified the following potential impacts that could arise as a result of the local plan:

- Physical loss of habitat.
- Noise, vibration, and light pollution.
- Air pollution.
- Recreation and urban impacts.
- Water quantity and quality.

**1.28** This HRA builds on and updates the information gathered at the scoping stage.

## Structure of this report

**1.29** This chapter (Chapter 1) has introduced the requirement to undertake HRA of the Local Plan. The remainder of the report is structured as follows:

- Chapter 2: Cannock Chase Local Plan summarises the content of the Draft Local Plan, which is the subject of this report.
- Chapter 3: Approach to HRA sets out the approach used and the specific tasks undertaken during the screening and Appropriate Assessment stages of the HRA.
- Chapter 4: HRA screening describes the findings of the screening stage of the HRA.
- Chapter 5: Appropriate Assessment describes the findings of the Appropriate Assessment stage of the HRA.
- Chapter 6: Conclusions and Next Steps summarises the HRA conclusions and describes the next steps to be undertaken.

## Chapter 2

# Cannock Chase Local Plan

## Characteristics of the Local Plan relevant to the HRA

**2.1** Cannock Chase District Council is currently preparing a new Local Plan to guide future development. Once adopted, the new Local Plan will replace the Cannock Chase Local Plan (Part 1) (2014-2028), which consists of the Core Strategy for the District and the Rugeley Town Centre Area Action Plan. The current Local Plan sets out the planning strategy for Cannock Chase up to 2028.

**2.2** The new Local Plan will also contain site specific allocations and standards to be applied to manage development in line with and to help deliver the strategic policy in the Local Plan. This part of the plan was originally being prepared as the Local Plan (Part 2) to sit alongside the adopted Local Plan (Part 1). It was decided that a full new Local Plan would instead be prepared.

**2.3** CCDC has now produced a Local Plan Preferred Options (February 2021) document, which includes draft policies and site allocations.

**2.4** The Local Plan Vision sets out an aspirational image of the District over the plan period which will guide the District priorities in future development. The Local Plan's vision is based on three principles:

- The District will continue to be made up of distinct communities with strong local character. People will be safer and healthier and will be proud of the area in which they live and work.
- The potential of the District's accessible location along major transport routes will be maximised to achieve a thriving local economy.

- People will lead greener, more environmentally friendly lifestyles, inspired by the Cannock Chase Area of Outstanding Natural Beauty.

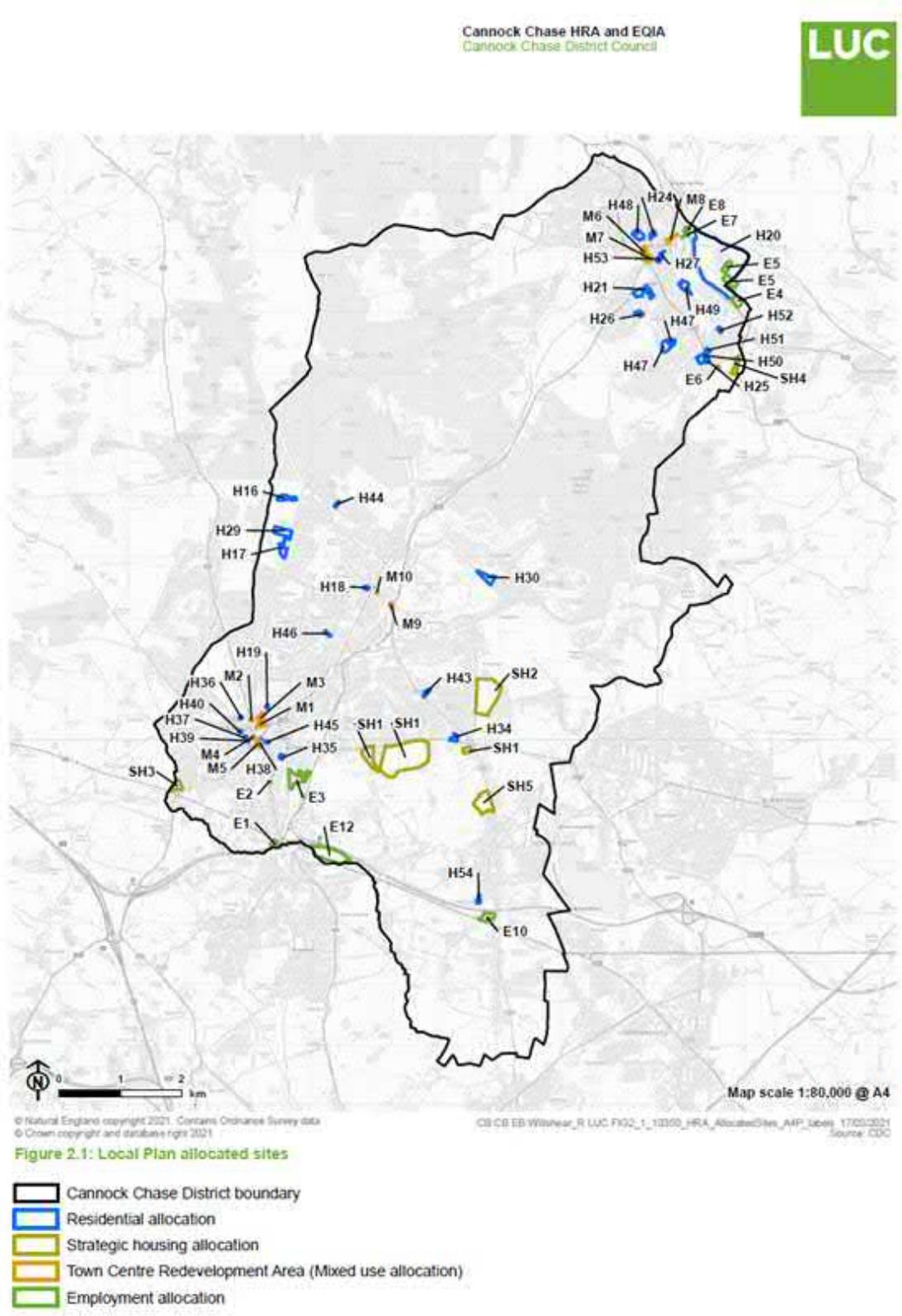
**2.5** This vision is supported by eight strategic objectives (SOs) as follows:

- SO1 Delivering High Quality Development that is Distinctive, Attractive and Safe
- SO2 Creating Community Infrastructure and Healthy Living Opportunities Across the District
- SO3 Providing for Housing Choice
- SO4 A Vibrant Local Economy and Workforce
- SO5 Supporting the Provision of Sustainable Transport and Communications Infrastructure
- SO6 Creating Attractive Town and Local Centres
- SO7 Protecting and Enhancing the Natural Environment
- SO8 Support a Greener Future

**2.6** The development policies and site allocations of the Local Plan are set out in chapters that address each strategic objective.

**2.7** The distribution of site allocations across the district is shown in Figure 2.1: and the full list of site allocations considered in this HRA is provided in Appendix D.

Figure 2.1: Local Plan allocated sites



## Chapter 3

### Approach to HRA

## Screening and Appropriate Assessment methodology

**3.1** The HRA of the Local Plan comprises two stages:

- Screening for likely significant effects; and
- Appropriate Assessment to determine if there will be an adverse effect on the integrity of any European site.

**3.2** The Scoping Report (2017) set out the proposed approach to the HRA. Given the time elapsed since the Scoping Report was prepared and the case law and amendments to legislation that have emerged since, the methodology for screening (this stage of HRA) differs from that presented in the Scoping Report. The updated methodology is set out below.

### Screening

**3.3** HRA Screening of the Local Plan has been undertaken in line with current available guidance and seeks to meet the requirements of the Habitats Regulations. The Habitats Regulations require screening to involve the stages outlined below **[See reference 18]**.

## Regulation 105(1)

### Stage required by Regulation

1. Determine whether the plan or project is within the scope of the Habitats Regulations
2. Determine whether the plan or project is of a type that could possibly have any (positive or negative) effect on a European site
3. Determine whether the plan or project is directly connect with or necessary to the management of the European sites potentially affected
4. Identify the European sites potentially adversely affected and their conservation objectives
5. Determine whether the plan or project is likely to have a significant adverse effect on any European site alone
6. Determine whether the plan or project is likely to have a significant adverse effect on any European site in combination with other plans or projects

## Regulation 105(4 & 5)

### Stage required by Regulation

7. Requires the information necessary to decide whether the plan or project would be likely to have a significant adverse effect on a European site either alone or in combination with other plans or projects

**3.4** Local Plans fall within the scope of the Habitats Regulations (screening stage 1) and CCDC is the competent authority with regards to screening the Local Plan. The methodology for the screening stages 2 to 6, along with the information required to determine whether the Local Plan is likely to have a significant effect (screening stage 7) is set out below and in Chapter 4.

**3.5** Chapter 4 and Appendix C provide the findings of the HRA screening of the Local Plan.

## Identifying types of potential impact from the Local Plan (Screening stage 2)

**3.6** Development such as new homes, employment space and infrastructure that is associated with development plans has the potential to impact upon European sites in a variety of ways, for example via air pollution or recreation pressure.

**3.7** For each of the Local Plan's policies and site allocations, consideration is given to the type of development the policy could result in, impacts that could arise from that type of development, and then whether there is an impact pathway to any sites sensitive to that impact, as described below.

## Identifying European sites that may be affected and their conservation objectives (Screening stages 3 & 4)

**3.8** In order to initiate the search of European sites that could potentially be affected by a development, it is established practice in HRA to consider sites within the local planning authority area covered by the plan, and other sites that may be affected beyond this area.

**3.9** A distance of 15km from the boundary of the plan area is typically used in the first instance to identify European sites with the potential to be affected by the proposals within a development plan. Consideration is then given to whether any more distant European sites may be functionally connected to the plan area, for example through hydrological pathways or recreational visits by residents. The 15km distance has been agreed with Natural England for HRAs elsewhere and is considered precautionary.

**3.10** The assessment also takes into account areas that may be functionally linked to the European sites. The term ‘functional linkage’ can be used to refer to the role or ‘function’ that land beyond the boundary of a European site might fulfil in terms of supporting the species populations for which the site was designated or classified. Such an area is therefore ‘linked’ to the site in question because it provides a (potentially important) role in maintaining or restoring a protected population at favourable conservation status.

**3.11** While the boundary of a European site will usually be drawn to include key supporting habitat for a qualifying species, this cannot always be the case where the population for which a site is designated or classified is particularly mobile. Individuals of the population will not necessarily remain in the site all the time. Sometimes, the mobility of qualifying species is considerable and may extend so far from the key habitat that forms the SAC or SPA that it would be entirely impractical to attempt to designate or classify all of the land or sea that may conceivably be used by the species [See reference 19]. HRA therefore considers whether any nearby (or linked) European sites make use of functionally linked habitats, and the impacts that could affect those habitats.

**3.12** Detailed information about each European site is provided in Appendix A, described with reference to Standard Data Forms for the SPAs and SACs, and Natural England’s Site Improvement Plans [See reference 20]. Natural England’s conservation objectives [See reference 21] for the SPAs and SACs have also been reviewed. These state that site integrity must be maintained or restored by maintaining or restoring the habitats of qualifying features, the supporting processes on which they rely, and populations of qualifying species.

**3.13** Together, the text of the Local Plan and information on the European sites have been used to confirm that the plan is not directly connected to or necessary for the management of any of the sites (Screening stage 3).

## Assessment of ‘likely significant effects’ of the Local Plan (Screening stage 5)

**3.14** As required under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 [See reference 22] (as amended), an assessment has been undertaken of the ‘likely significant effects’ of the Local Plan.

**3.15** A risk-based approach involving the application of the precautionary principle has been adopted in the assessment, such that a conclusion of ‘no significant effect’ has only been reached where it is considered unlikely, based on current knowledge and the information available, that a Local Plan policy or site allocation would have a significant effect on the integrity of a European site.

**3.16** A screening matrix has been prepared (Appendix C), which considers the potential for likely significant effects resulting from each policy and site allocation in the Local Plan. A ‘traffic light’ approach has been used in the screening matrix to record the likely impacts of each policy and site allocation on European sites and their qualifying habitats and species, using the colour categories shown below.

Red	There are likely to be significant effects (Appropriate Assessment required).
Amber	There may be significant effects, but this is currently uncertain (Appropriate Assessment required).
Green	There are unlikely to be significant effects (Appropriate Assessment not required).

**3.17** The screening assessment is conducted without taking mitigation (e.g. embedded in policy) into account, in accordance with the 'People over Wind' judgment.

**3.18** For some types of impacts, the potential for likely significant effects has been determined on a proximity basis, using GIS data to determine the proximity of potential development locations to the European sites that are the subject of the assessment. However, there are many uncertainties associated with using set distances as there are very few standards available as a guide to how far impacts will travel. Therefore, where assumptions have been made, these are set out in Chapter 4.

**3.19** Relevant case law helps to interpret when effects should be considered as a likely significant effect, when carrying out HRA of a land use plan.

**3.20** In the Waddenzee case [[See reference 23](#)], the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:

- An effect should be considered 'likely', "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site" (para 44).
- An effect should be considered 'significant', "if it undermines the conservation objectives" (para 48).
- Where a plan or project has an effect on a site "but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned" (para 47).

**3.21** A relevant opinion delivered to the Court of Justice of the European Union commented that:

"The requirement that an effect in question be 'significant' exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of

having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill.”

**3.22** This opinion (the ‘Sweetman’ case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered ‘trivial’ or de minimis; referring to such cases as those “that have no appreciable effect on the site”. In practice such effects could be screened out as having no likely significant effect – they would be ‘insignificant’.

**3.23** The HRA screening assessment therefore considers whether the Local Plan policies could have likely significant effects either alone or in combination.

## Assessment of potential in-combination effects (Screening stage 6)

**3.24** Regulation 105 of the Habitats Regulations 2017 requires an Appropriate Assessment where “a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site”. Therefore, where likely significant effects are identified for the Local Plan it is necessary to consider whether there may also be significant effects in combination with other plans or projects.

**3.25** The Scoping Report (2019) identified which other plans and projects in addition to the new CCDC Local Plan may affect the European sites that will be the focus of this assessment. This included a review of relevant plans to identify those components of nearby plans that could have an impact on the European sites within the Cannock Chase boundary (+15km), e.g. areas or towns where additional housing or employment development is proposed near to the European sites (as there could be effects from the transport, water use, infrastructure and recreation pressures associated with the new developments).

**3.26** There are a large number of potentially relevant plans; therefore the review has focussed on planned spatial growth within authorities adjacent to Cannock Chase as well as other authorities that are adjacent to the European sites included in this HRA. The findings of any associated HRA work for those plans have been reviewed where available.

**3.27** Appendix B presents the updated review of other plans, outlining the components of each plan that could have an impact on nearby European sites. Where likely significant in-combination effects cannot be ruled out at the screening stage, the Appropriate Assessment will gather the information necessary to consider these, for example traffic data for air pollution, or housing provisions and major site allocations in neighbouring authorities for recreation pressure.

**3.28** The following authorities' plans have the potential to contribute to in-combination effects with the CCDC Local Plan:

**3.29** County that Cannock Chase is in:

- Staffordshire County

**3.30** Shared boundary with Cannock Chase District:

- Stafford Borough
- Lichfield District
- Walsall Borough
- South Staffordshire District

**3.31** Other local authorities within Cannock Chase SAC Partnership:

- East Staffordshire Borough
- Wolverhampton City

## Appropriate Assessment

**3.32** Following the screening stage, if likely significant effects on European sites are unable to be ruled out, the plan-making authority is required under Regulation 105 of the Habitats Regulations to make an 'Appropriate Assessment' of the implications of the plan for European sites, in view of their conservation objectives. Appropriate Assessment should consider the impacts of the plan (either alone or in combination with other projects or plans) on the integrity of European sites with respect to their conservation objectives and to their structure and function [See reference 24]. This will involve detailed consideration of plans and projects with the potential for in-combination effects, where relevant.

### Assessing the effects on site integrity

**3.33** A site's integrity depends on it being able to sustain its 'qualifying features' (i.e. the habitats and species for which it has been designated) and to ensure their continued viability. The Holohan judgement also clarifies that effects on species and habitats not listed as qualifying features, but which could result in secondary effects upon the qualifying features of European sites also need to be considered. The Appropriate Assessment, if required, will build upon the information set out in Appendix A of this report, to consider the characteristics of supporting habitats and species that could be affected by impacts identified at the screening stage.

**3.34** A high degree of integrity at a site is considered to exist where the potential to meet a site's conservation objectives is realised and where the site is capable of self-repair and renewal with a minimum of external management support.

**3.35** A conclusion needs to be reached as to whether or not the Local Plan would adversely affect the integrity of a European site. Assessing the effects on the site(s) integrity involves considering whether the predicted impacts of the

Local Plan policies and/or site allocations (either alone or in combination) have the potential to:

- Cause delays to the achievement of conservation objectives for the site.
- Interrupt progress towards the achievement of conservation objectives for the site.
- Disrupt those factors that help to maintain the favourable conditions of the site.
- Interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site.
- Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem.
- Change the dynamics of relationships that define the structure or function of the site (e.g. relationships between soil and water, or animals and plants).
- Interfere with anticipated natural changes to the site.
- Reduce the extent of key habitats or the population of key species.
- Reduce the diversity of the site.
- Result in disturbance that could affect the population, density or balance between key species.
- Result in fragmentation.
- Result in the loss of key features **[See reference 25]**.

**3.36** The conservation objectives for each SAC and SPA (Appendix A) are generally to maintain the qualifying features in favourable condition. Natural England does not define conservation objectives for Ramsar sites but these can often be inferred from those for co-located SAC or SPA features. The Site Improvement Plans for each site provide a high level overview of the issues (both current and predicted) affecting the condition of the designated features on the site(s) and outline the priority measures required to improve the condition

of the features. An Appropriate Assessment draws on these to help to understand what is needed to maintain the integrity of the European sites.

**3.37** For each site where an uncertain or likely significant effect is identified in relation to the Local Plan, an Appropriate Assessment would set out the potential impacts and make a judgement (based on the information available) regarding whether the impact will have an adverse effect on the integrity of the site. Consideration would be given to the potential for mitigation measures to be implemented that could reduce the likelihood or severity of the potential impacts such that there would not be an adverse effect on the integrity of the site.

## Chapter 4

### HRA Screening

#### Screening conclusions and whether Appropriate Assessment is required

**4.1** The HRA screening of the Local Plan has determined that Appropriate Assessment is required, as likely significant effects from the plan's policies and site allocations cannot be ruled out through screening. The reasoning for this is presented below, in response to each screening stage (Table 3.1).

Is the Local Plan of a type that could possibly have any (positive or negative) effect on a European site?

**4.2 Yes**, the Local Plan will result in several of the types of activity that could have impacts on European sites (see Chapter 3). The Local Plan will result in new development (e.g. housing, employment and infrastructure), which will have associated impacts (e.g. changes to traffic distribution, types or distribution of recreation, water abstraction and discharge, light or noise).

Is the Local Plan directly connected with or necessary to the management of any European sites?

**4.3 No**, the Local Plan is not connected with or necessary to the management of any European sites.

Which European sites could be potentially adversely affected?

**4.4** A number of European sites (Figure 4.1) have the potential to be adversely affected by the Local Plan due to their proximity and/or ecological connectivity to the Plan area and have therefore been considered within this HRA.



**4.5** The following European sites are within 15km of the Plan area and have been screened in:

- Cannock Chase SAC (within and adjacent to the district; north);
- Cannock Extension Canal SAC (within and adjacent to the district; south);
- Pasturefields Salt Marsh SAC (c.6.3km north);
- West Midlands Mosses SAC (c.7.9km north);
- Midland Meres and Mosses Ramsar (c.7.9km north);
- Mottey Meadows SAC (c.12.3km west); and
- River Mease SAC (c.13.7km east).

**4.6** No other European sites have connectivity to the Plan area.

**4.7** Some European sites may also rely on functionally linked land outside the designated site area (more likely where there are highly mobile species such as birds and bats; and in some cases fish and invertebrates). None of the European sites within 15km of the Plan area is designated for bird or bat species; however the River Mease SAC is designated for other mobile species and some of the sites support non-qualifying mobile species. The Holohan judgement (see paragraph 1.17 above) has confirmed that non-qualifying features of a site may be relevant in HRA if the qualifying features rely on them. However, in this case, effects on functionally linked land can be screened out in all cases:

- River Mease SAC: designated for fish species, crayfish and otters, which may rely on habitats beyond the SAC boundary. However, the site is 13km from Cannock Chase and upstream from the district.
- Cannock Chase SAC: designated for heathland habitats, which support a number of mobile species including bats and heathland birds that are referred to in the site's Supplementary Advice for Conservation Objectives **[See reference 26]**. However, impacts on off-site habitat used by these species would be unlikely to affect the feature for which the site is designated (heathland).

- Pasturefields Salt Marsh SAC: designated for saltmarsh habitats that support wading birds [See reference 27] but, as at Cannock Chase SAC, impacts on off-site habitats used by these species would be unlikely to affect the site's designated features.

4.8 None of the other sites support significant populations of mobile species.

## Is the Local Plan likely to have a significant adverse effect on any European site alone?

4.9 Uncertain; likely significant effects from the Local Plan cannot be ruled out at the screening stage, because of potential physical loss of habitat, air pollution, recreation pressure / urban impacts, and changes in water quantity or quality at Cannock Chase SAC and Cannock Extension Canal SAC, as discussed below.

### Physical loss of habitat

4.10 Any development resulting from the Local Plan will be located within Cannock Chase District; therefore, loss of habitat from within the boundaries of a European site will be able to be ruled out in relation to most of the European sites as they lie entirely outside of Cannock Chase. However, without mitigation, the loss of habitat from within the boundaries of the European sites that lie partially within the District (Cannock Chase SAC and Cannock Extension Canal SAC) is possible if development comes forward in those areas.

4.11 None of the allocated sites lie within a European site; however, in theory development could come forward outside of allocated sites, for example rural housing under Policy SO3.1. The physical loss of habitat within a European site therefore remains screened in as mitigation (such as safeguards within policies) cannot be taken into account at the screening stage.

## Air pollution

**4.12** Air pollution is most likely to affect European sites where plant, soil and water habitats are the qualifying features, but some qualifying animal species may also be affected, either directly or indirectly, by any deterioration in habitat as a result of air pollution. Deposition of pollutants to the ground and vegetation can alter the characteristics of the soil, affecting the pH and nitrogen (N) availability that can then affect plant health, productivity and species composition. All of the sites have plant and/or water habitats or species as their qualifying feature, and Cannock Chase SAC, Cannock Extension Canal SAC, and West Midlands Mosses SAC are identified within their Site Improvement Plans as being sensitive to nitrogen. Air quality data [See reference 28] for these sites shows that habitat-specific critical loads for nitrogen are exceeded at all three sites. West Midlands Mosses SAC and Cannock Extension Canal SAC are in favourable condition [See reference 29], despite the critical loads being exceeded; and the 'unfavourable' SSSI units at Cannock Chase SAC are not due to nitrogen levels.

**4.13** In terms of vehicle traffic, nitrogen oxides (NO<sub>x</sub>, i.e. NO and NO<sub>2</sub>) are considered to be the key pollutants. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NO<sub>x</sub> can cause eutrophication of soils and water.

**4.14** Screening guidance indicates that where plans could result in an increase (alone or in-combination) in annual average daily traffic (AADT) flows of 1,000 vehicles or 200 heavy duty vehicles (HDV) within 200m of European site features that are sensitive to air pollution, the potential for likely significant effects exists and there is a need for quantitative air quality assessment [See reference 30], [See reference 31], [See reference 32]. It has been assumed that only major roads (motorways and 'A' roads) are likely to experience any significant increases in vehicle traffic as a result of development in the Local Plan area (i.e. greater than 1,000 AADT), alone or in combination with the impacts of plans in nearby authorities. As such, where a development could occur within 200m of only minor roads, no significant effect from traffic-related air pollution is considered to be the likely outcome.

**4.15** The following roads are within 200m of European sites sensitive to air pollution:

- Cannock Chase SAC:
  - A513 – runs along northern edge of district so allocated sites in and around Rugeley are more likely to contribute to traffic on this road (e.g. commuting to/from Stafford).
  - A460 – runs between Cannock and Rugeley, so all allocated sites could contribute traffic to this road.
- Cannock Extension Canal SAC:
  - A5 – runs roughly parallel to the M6 in the southern part of the district and likely to only be used by the allocated sites adjacent to the road: H54, E10, and SH3.
- West Midland Mosses SAC:
  - A518 – lies out of the district and does not have a direct route to it. Likely that no allocated sites will have a significant effect alone although all allocated sites could contribute to an effect in combination.

**4.16** At present, there is no traffic data available yet to confirm whether any of the allocated sites alone or, more likely, in combination (together and/or with traffic associated with other plans or projects) could increase traffic flows by 1,000 AADT. Therefore, air pollution effects at Cannock Chase SAC, Cannock Extension Canal SAC and West Midland Mosses SAC are screened in.

### Recreation and urban impacts

**4.17** Recreation activities and general human presence can have an adverse impact on the integrity of a European site as a result of physical disturbance, e.g. through erosion, arson and trampling. Where policies or site allocations in the Local Plan are likely to result in an increase in the local population (i.e. residential development), or where an increase in tourism is considered likely, the potential for an increase in visitor numbers and the associated impacts at sensitive European sites will be identified.

**4.18** The only European site that has been identified as sensitive to recreation and urban impacts is Cannock Chase SAC. This site is not designated for bird or bat species that would be sensitive to disturbance from the presence of people or dogs, but its habitats are sensitive to other forms of disturbance, for example fires.

**4.19** A 2013 study [See reference 33] by Footprint Ecology based on visitor survey data [See reference 34] concluded that the 'in combination' impact of proposals involving a net increase of one or more dwellings within a 15km radius of the SAC could have an adverse effect on its integrity; with a significantly higher proportion of visitors coming from within 8km. Therefore, proposed residential or tourism development within 15km of the Cannock Chase SAC could have significant effects. Members of the Cannock Chase SAC Partnership formally acknowledge a 15km zone of influence, with financial contributions being sought in the 0-8km zone. Further information on this is given in Cannock Chase District Council's 'Cannock Chase SAC Guidance to Mitigate the Impact of New Residential Development' [See reference 35].

**4.20** Further evidence documents have since been completed by Footprint Ecology to monitor and guide the ongoing mitigation works and to ensure the evidence base for Appropriate Assessment for any future Local Plan review remains robust. These evidence documents include:

- Cannock Chase SAC Planning Evidence Base Review [See reference 36];
- Evidence base to inform a car-park strategy and site user strategy for Cannock Chase [See reference 37];
- Cannock Chase Visitor Survey 2018 [See reference 38];
- Public Consultation Responses Report [See reference 39];
- Detailed Implementation Plan, Site User Infrastructure, Education and Engagement [See reference 40];
- Detailed Implementation Plans, car parking [See reference 41].

**4.21** The evidence shows that any development which would increase the human population, tourism or visitor use within 15km of the Cannock Chase SAC may have a significant impact on the site.

**4.22** Applications for residential development in Cannock Chase district are required to make an appropriate financial contribution to mitigate any harm the development will cause to Cannock Chase SAC. Recreation and urban effects are screened in, in relation to Cannock Chase SAC, for all residential developments, alone and in combination with other plans and projects.

## Water quantity and quality

**4.23** The following sites have qualifying features that are sensitive to changes in water levels or quality:

- Cannock Chase SAC;
- Cannock Extension Canal SAC;
- Midland Meres and Mosses (Phase 1) Ramsar site / West Midland Mosses SAC;
- Motte Meadows SAC; and
- River Mease SAC.

**4.24** However, Midland Meres and Mosses (Phase 1) Ramsar site / West Midland Mosses SAC, Motte Meadows SAC and River Mease SAC are not hydrologically connected to the Plan area or are upstream.

**4.25** Cannock Chase SAC and Cannock Extension SAC are within the district and therefore have the potential to be affected by changes in water quantity or quality. Cannock Chase SAC is sensitive to changes in hydrology and drainage, and one SSSI unit is in unfavourable condition due to water abstraction. Cannock Extension Canal SAC is identified as sensitive to water pollution and is in favourable condition.

**4.26** Water supply in Cannock Chase is managed by South Staffs Water (SSW) and wastewater treatment by Severn Trent Water. There are wastewater treatment works at Cannock (discharges into River Sow & Penk Catchment [See reference 42]; not linked to the SACs via watercourses) and Rugeley (discharges into River Trent and flows away from Cannock Chase SAC). Discharges into these treatment works are unlikely to affect Cannock Chase SAC or Cannock Extension Canal SAC due to their location; although it not currently known whether development in Cannock Chase district could utilise other treatment works or discharge/run-off directly into waterbodies. Development can also affect rates of water run-off and groundwater recharge.

**4.27** SSW adopted a new Water Resources Management Plan (WRMP) in December 2019. The WRMP sets out the water company's plans to maintain a balance between supply and demand over 25 years from 2020 to 2045.

**4.28** SSW's latest Water Cycle Study – Phase I Scoping Study was published in February 2020 [See reference 43]. It was concluded from this study that while a certain level of growth can be accommodated with minimal additional infrastructure, significant new infrastructure and upgrades to existing network (and wastewater treatment works) will be required to accommodate growth in southern Staffordshire (which includes Stafford Borough, Lichfield District, Cannock Chase District, Tamworth Borough and South Staffordshire District).

**4.29** The Water Cycle Study assessed the housing need identified by each of the local authorities at that time, which included 5,112-7,614 within Cannock Chase district from 2018 to the end of the Local Plan period. While the new Local Plan plans for a number of homes within this range (5,516 plus 500 unmet need from neighbouring authorities), it is not clear what the differences are between the current policy and site allocations and those provided for the Water Cycle Strategy. The map of development locations in the Water Cycle Strategy differs from the current proposals, although some sites appear to be the same.

**4.30** Effects due to changes in water quantity are screened in for Cannock Chase SAC and for water quality at Cannock Extension Canal SAC. Water quantity is relevant to all allocated sites (alone or in combination) but particularly

residential allocations where development results in use of water from groundwater or River Trent tributaries that pass through Cannock Chase SAC.

**4.31** Water quality is only relevant where development could take place in locations other than allocated sites as none of the allocated sites are close to, upstream of or uphill from Cannock Extension Canal SAC, and there are no site allocations close to / upstream of watercourses passing through Cannock Chase SAC.

## Other effects

**4.32** Noise and vibration effects, e.g. during the construction of new housing or other development, are most likely to disturb bird species and are thus a key consideration with respect to European sites where birds are the qualifying features, although such effects may also impact upon some mammals and fish species. Artificial lighting at night (e.g. from street lamps, flood lighting and security lights) is most likely to affect bat populations and some nocturnal bird species, and therefore have an adverse effect on the integrity of European sites where bats or nocturnal birds are a qualifying feature. As none of the sites in this HRA are designated for (or have supporting species that are) bird or bat species, noise, vibration and light pollution need not be considered in this assessment.

**4.33** No other effects are considered likely.

## **Is the Local Plan likely to have a significant adverse effect on any European site in combination with other plans or projects?**

**4.34** Uncertain: likely significant effects from the Local Plan in combination with the other plans and projects cannot be ruled out at the screening stage. Other development plans within Staffordshire County, Lichfield, Walsall, and

Wolverhampton could contribute to air pollution, recreation pressure, changes in water quality/quantity, or other effects on functionally linked land. Without mitigation (e.g. policy safeguards or standard pollution control measures), these could combine with any of the potential effects identified for the Local Plan alone, even if the Local Plan is found not to have adverse effects on integrity on its own.

**4.35** For example, recent case law known as the Wealden judgement has revised the method by which Natural England expects to see in-combination air pollution effects assessed. The implication of the judgement is that, where the road traffic effects of other plans or projects are known or can be reasonably estimated (including those of adopted plans or consented projects), then these should be included in road traffic modelling by the local authority whose local plan or project is being assessed. The screening criteria of 1,000 AADT should then be applied to the traffic flows of the plans in combination.

### Screening conclusion

**4.36** Appropriate Assessment is required as likely significant effects from the Local Plan, alone or in combination with other projects or plans, cannot be ruled out without further assessment (which would include taking mitigation into account).

**4.37** The scope of the Appropriate Assessment has been narrowed down by considering each policy and site allocation, to determine whether it would result in the type of development that could have an effect on a European site; this is detailed in Appendix C. The proposed policies in the Regulation 18 Preferred Options Local Plan that permit the type of development that could affect European sites are summarised in Table 4.1: All of the preferred site allocations are screened in.

## Policies giving rise to the need for Appropriate Assessment of the Local Plan

### Policy SO2.3: Provision of Active Leisure and Sport

Likely activities (operation) to result as a consequence of the proposal:

- Sport facilities (within major development)
- Changes in water abstraction / discharge
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Air pollution
- Changes in water quantity or quality

Does the policy need to be screened into the Appropriate Assessment?

- Yes – sports facilities have the potential to act as a trip generator and, depending on the type of facility (e.g. swimming pool), could result in changes to water abstraction / discharge. This policy relates to sports facilities as part of major development; therefore, the principle of development and its location will be assessed separately (e.g. allocated sites and Policy SO3.1) but with reference to this policy where relevant.

## Policy SO3.1: Provision for New Homes

[Minimum of 6,016 dwellings at five strategic housing allocations, 39 non-strategic allocations, and within rural areas where certain criteria are met.]

Likely activities (operation) to result as a consequence of the proposal:

- Residential development
- Changes in water abstraction / discharge
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Recreational pressure / urban effects
- Changes in water quality/quantity
- Air pollution
- Loss of habitat

Does the policy need to be screened into the Appropriate Assessment?

- Yes – Cannock Chase SAC and Cannock Extension Canal SAC are sensitive to changes in water quantity / quantity, air pollution and loss of habitat; Cannock Chase SAC is also sensitive to recreation pressure / urban effects (fires), and West Midland Mosses SAC is sensitive to air pollution.
- Residential development within 15km of Cannock Chase SAC (i.e. the whole Plan area) could result in an increase in recreation pressure / urban effects. No allocated sites are within a European site but non-allocated development in rural areas could in theory result in physical loss of habitat.

There is insufficient information (traffic data and information on water abstraction / discharge) to rule out effects due to changes in water quality / quantity and air pollution, at the screening stage.

## **Policy SO3.4: Gypsies, Travellers and Travelling Show People**

Likely activities (operation) to result as a consequence of the proposal:

- Residential development
- Changes in water abstraction / discharge
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Recreational pressure / urban effects
- Changes in water quality/quantity
- Air pollution

Does the policy need to be screened into the Appropriate Assessment?

- Yes – although the quantum of development is small, the residential development permitted by this policy will combine with the residential development permitted by Policy SO3.1.

## Policy SO4.2: Provision for New Employment Uses

[50 ha, with 22 ha provided on 10 allocated (safeguarded) sites.]

Likely activities (operation) to result as a consequence of the proposal:

- Employment development and supporting facilities (e.g. childcare)
- Changes in water abstraction / discharge
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Changes in water quality/quantity
- Air pollution
- Loss of habitat

Does the policy need to be screened into the Appropriate Assessment?

- Yes – there is insufficient data (traffic data and information on water abstraction / discharge) to rule out effects due to changes in water quality / quantity and air pollution, at the screening stage. Employment development could in theory take place within a European site although this policy directs Use Class E development to town centres.

## Policy SO4.3: Sustainable Tourism and the Rural Economy

Likely activities (operation) to result as a consequence of the proposal:

- Employment development
- Tourist accommodation
- Visitor and recreational facilities
- Blue infrastructure
- Changes in water abstraction / discharge
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Recreation pressure
- Changes in water quality/quantity
- Air pollution
- Loss of habitat

Does the policy need to be screened into the Appropriate Assessment?

- Yes – tourism and employment development could improve access to European sites and increase visitor pressure (Cannock Chase SAC is sensitive to urban effects: fire) and could in theory take place within a European site. Is not possible to quantify changes in water quality / quantity or vehicle traffic that could occur as a result of this policy.

## **Policy SO6.5: Cannock Town Centre Redevelopment Areas**

[Five allocated sites in Cannock.]

Likely activities (operation) to result as a consequence of the proposal:

- Mixed use development
- Changes in water abstraction / discharge
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Recreational pressure
- Changes in water quality/quantity
- Air pollution

Does the policy need to be screened into the Appropriate Assessment?

- Yes – sites will result in the same types of development as the residential and employment site allocations (although there is no possibility that development will occur within a European site, with this policy).

## **Policy SO6.6: Rugeley Town Centre Redevelopment Areas**

[Three allocated sites in Rugeley.]

Likely activities (operation) to result as a consequence of the proposal:

- Mixed use development
- Changes in water abstraction / discharge
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Recreational pressure
- Changes in water quality/quantity
- Air pollution

Does the policy need to be screened into the Appropriate Assessment?

- Yes – as for Policy SO6.5.

## **Policy SO6.7: Hednesford Town Centre Redevelopment Areas**

[Two allocated sites in Hednesford.]

Likely activities (operation) to result as a consequence of the proposal:

- Mixed use development
- Changes in water abstraction / discharge
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Recreational pressure
- Changes in water quality/quantity
- Air pollution

Does the policy need to be screened into the Appropriate Assessment?

- Yes – as for Policy SO6.5.

## **Policy SO8.8: Managing Waste**

Likely activities (operation) to result as a consequence of the proposal:

- Waste management facilities
- Changes in vehicle traffic
- Changes in water abstraction / discharge

Type of adverse effect that could arise from likely activities:

- Air pollution
- Loss of habitat
- Changes in water quantity / quality

## Does the policy need to be screened into the Appropriate Assessment?

- Yes – this policy could increase HDV traffic on roads within the district. There is currently insufficient information (potential development type/location, traffic data) to rule out air pollution or water quantity/quality effects. As this policy is not associated with allocated sites, development could in theory take place within a European site.

## Chapter 5

# Appropriate Assessment

## Assessment into whether there will be adverse effects on integrity of European sites

**5.1** The HRA screening has identified the need for Appropriate Assessment, as likely significant effects from the Local Plan (alone or in combination with other projects or plans) at Cannock Chase SAC, Cannock Extension Canal SAC and West Midland Mosses SAC cannot be ruled out without further assessment. These likely significant effects related to from the Local Plan related to potential physical loss of habitat, air pollution, recreation pressure / urban impacts, and changes in water quantity or quality.

**5.2** For each type of impact that has been identified, the Appropriate Assessment considers the effects on each of the European sites, the elements of the Local Plan (and other plans or projects, where relevant) that would have those effects, and any mitigation or safeguards in place that would reduce the effects. The assessment then considers whether there would be an adverse effect on the integrity of a European site.

**5.3** The following policies in the Local Plan will result in the type of development or activities that could affect European sites (see Table 4.1):

- Policy SO2.3: Provision of Active Leisure and Sport;
- Policy SO3.1: Provision for New Homes;
- Policy SO3.4: Gypsies, Travellers and Travelling Show People;
- Policy SO4.2: Provision for New Employment Uses;

- Policy SO4.3: Sustainable Tourism and the Rural Economy;
- Policy SO6.5: Cannock Town Centre Redevelopment Areas;
- Policy SO6.6: Rugeley Town Centre Redevelopment Areas;
- Policy SO6.7: Hednesford Town Centre Redevelopment Areas; and
- Policy SO8.8: Managing Waste.

**5.4** At present, all allocated sites are screened, although some types of effect apply only to sites in specific areas (see Appendix D).

## Physical loss of habitat

**5.5** It was not possible to rule out loss of habitat within a European site at the screening stage as four of the Local Plan policies in theory permit development in locations other than allocated sites (SO3.1, SO4.2, SO4.3 and SO8.8)..

**5.6** However, mitigation can be taken into account in the Appropriate Assessment. The following Local Plan policies provide safeguards that mean that development would not be permitted within Cannock Chase SAC or Cannock Extension Canal SAC.

### POLICY SO7.1: PROTECTING, CONSERVING AND ENHANCING BIODIVERSITY AND GEODIVERSITY

Development proposals will support the protection, conservation, enhancement and restoration of designated biodiversity and geodiversity sites.

The existing, or potential, international, national and locally designated sites of importance for biodiversity or geodiversity are shown on the Proposals Map.

The designated sites include:

- Special Areas of Conservation;
- Ancient Woodland
- Sites of Special Scientific Interest;
- Local Sites of Biological Interest;
- Local Nature Reserves; and
- Local Geological Sites.

Development which has a harmful impact on the designated biodiversity and geodiversity sites will not be permitted unless there are exceptional circumstances. These circumstances will only apply where:

- There are no suitable alternatives;
- There are 'imperative reasons for overriding public interest'; and
- Necessary compensatory provision can be secured.

Development proposals will provide net gains to biodiversity through the creation and restoration of wildlife corridors and the stepping stones to connect them.

#### **POLICY SO7.3: SPECIAL AREAS OF CONSERVATION**

Development will not be permitted where it would lead directly or indirectly to an adverse impact upon a Special Area of Conservation (SAC) and the effects cannot be mitigated.

The effective avoidance and/or mitigation of any identified adverse effects must be demonstrated to the Council as competent authority, and secured by means of a suitable mechanism (for example, a legal agreement) prior to the approval of the development.

### **Cannock Chase SAC**

To ensure the Cannock Chase SAC is not harmed, all development that results in a net increase in dwellings within a 15km radius (or any subsequent distance as a result of updated evidence and agreed by Cannock Chase SAC Partnership) of any boundary of Cannock Chase SAC must take all necessary steps to avoid or mitigate any adverse effects upon the SAC's integrity.

This may include:

- contributions to habitat management and creation;
- access management and visitor infrastructure;
- publicity, education and awareness raising;
- provision of additional recreation space within development sites where they can be accommodated, and where they cannot, by contributions to off-site alternative recreation space; and measures to encourage sustainable travel.

### **Cannock Extension Canal SAC**

Any development within the water catchment area of the Cannock Extension Canal SAC will be deemed to have an adverse impact on the Cannock Extension Canal SAC. Mitigation for any identified adverse effects must be demonstrated and secured prior to approval of development and ongoing monitoring of impact on the SAC will be required.

Developments outside the water catchment area may be required to demonstrate that they will have no adverse effect on the integrity of the SAC.

**5.7** Sufficient policy safeguards are included in the Local Plan to conclude there will be no adverse effects on the integrity of any European sites, as a result of physical habitat loss, either alone or in combination with other plans or projects.

## Air pollution

**5.8** A number of policies within the Local Plan (SO2.3, SO3.1, SO3.4, SO4.2, SO4.3, SO6.5, SO6.6, SO6.7, SO8.8), and allocated sites associated with them, permit development that could increase traffic on roads that pass within 200m of European sites sensitive to air pollution:

- Cannock Chase SAC: A513 & A460
- Cannock Extension Canal SAC: A5
- West Midland Mosses SAC: A518.

**5.9** There is currently insufficient data [\[See reference 44\]](#) to quantify changes in traffic flows that could arise from development associated with the Local Plan although, where location is specified within the policies it can help narrow down the development that is likely to contribute to an effect.

- Policy SO3.1 plans for a minimum of 6,016 new homes, across five strategic allocations, 39 non-strategic and some homes in rural areas (where specific criteria are met). Only the largest site allocations have the potential to generate >1,000 AADT alone, although some/all of the other sites could have in-combination effects at any/all of the three SACs. The largest sites are:
  - South Lichfield Road, Cannock (875 homes, site ref. SH1): close to the A513 which passes Cannock Chase SAC; and
  - Rugeley Power Station, Rugeley (1,000 homes, site ref. H20): close to the A5 which passes Cannock Extension Canal SAC.
- Policy SO3.4: plans for 11 new plots for Gypsies, Travellers and Travelling Show People (outside of Green Belt).

- Policy SO2.3 encourages leisure/sport facilities within major developments (any allocated sites / development over 10 homes / 1 ha).
- Policy SO4.2 plans for 50ha of new employment development (within 11 existing employment areas and outside of existing employment areas, which could be anywhere in district).
- Policy SO4.3 encourages sustainable tourism in rural areas (could contribute traffic to any of the roads passing the three SACs).
- Policy SO6.5 identifies redevelopment areas (five allocated sites) in Cannock town centre (less likely to contribute traffic to road passing West Midland Mosses SAC).
- Policy SO6.6 identifies redevelopment areas (three allocated sites) in Rugeley town centre (less likely to contribute traffic to road passing Cannock Extension Canal SAC).
- Policy SO6.7 identifies redevelopment areas (two allocated sites) in Hednesford town centre (could contribute traffic to any of the roads passing the three SACs, although contribution may be less than closer sites).
- Policy SO8.8 permits waste development (close to primary road network, so less likely to pass Cannock Chase SAC).

### 5.10 Several of the policies within the Local Plan seek to reduce travel by car:

- Policy SO4.4 supports live/work units within residential areas;
- Policy SO5.2 requires major development proposals to demonstrate digital technologies including infrastructure for home working and journey planning;
- Policy SO5.3 requires major to developments to show how they will contribute to a reduction in carbon-intensive (and therefore nitrogen-emitting) modes of travel; and
- Policy SO5.4 supports measures to improve facilities for cycling, walking and public transport.

**5.11** Policies SO7.1 and SO7.3 also provide general protection for the SACs (Cannock Chase SAC & Cannock Extension Canal SAC specifically, and West Midland Mosses SAC more generally).

**5.12** These policies could provide sufficient safeguards to ensure that single large developments (for example South Lichfield Road in Cannock [SH1], or Rugeley Power Station [H20]) are required to demonstrate avoidance or mitigation of any effects on European sites. However, the policies do not currently make specific reference to air quality. This could be incorporated into Policy SO7.1 or SO7.3 to strengthen them, or the site allocation policies that will be drafted for the Regulation 19 Plan.

**5.13** Additional mitigation has been incorporated into guidance relating to 'Cannock Chase SAC – guidance to mitigate the impact of residential development'; this mitigation largely aims at reducing visitor pressure within the SAC, but Natural England have added the following to their 'frequently asked questions' guidance [[See reference 45](#)] that sits alongside the mitigation document on Cannock Chase District Council's website:

"The habitat which Cannock Chase SAC is designated for (European Lowland Heathland) is also known to be harmed by increases in the level of atmospheric deposition of Nitrogen Oxide, Nitrite & Nitrate (collectively referred to as NO<sub>x</sub>). A number of different types of development can increase the levels of NO<sub>x</sub> deposition on Cannock Chase SAC; both directly (via increasing industrial emissions) or indirectly (via increasing traffic usage on main roads that run within 200m of the boundary of the SAC).

If an application is required to undertake an Environmental Impact Assessment a HRA should also be undertaken to determine if it could cause harm to Cannock Chase SAC via significantly increasing the level of NO<sub>x</sub> deposition (directly or indirectly, alone or in combination with other developments).

If it is determined that the application will cause harm to the SAC then the developer will need to reduce their impact and/or provide mitigation proportional to their harm or else the application will need to be refused. Where NOx deposition is determined to be an issue further detailed guidance in how to complete this bespoke HRA will be provided by the SAC Team to the DM officer considering the application."

**5.14** Although it may be possible to avoid or mitigate effects identified at the individual site level, identifying and mitigating effects strategically (for example all of the sites allocated in a plan or in combination with other plans or projects) needs to be undertaken by local authorities.

**5.15** Traffic data is therefore required that shows current traffic flows (AADT for all traffic and for HDVs) and flows at the end of the Plan period (with and without Plan development), for each of the roads (A513, A460, A5 and A518) where they pass Cannock Chase SAC, Cannock Extension Canal SAC and West Midland Mosses SAC. If this data shows increases of more than 1,000 AADT or 200 HDV, then air quality assessment may be required to determine the level of pollutant deposition likely to occur at the SACs and then ecological assessment would also be needed to understand the sensitivity of the habitats within 200m of the roads to this level of deposition.

**5.16** It is therefore not currently possible to rule out adverse effects on the integrity of Cannock Chase SAC, Cannock Extension Canal SAC and West Midland Mosses SAC, due to a lack of traffic data.

## Recreation pressure and urban effects

**5.17** Effects could not be ruled out at the screening stage because Cannock Chase SAC is sensitive to recreation pressure and urban effects (e.g. fires) and previous work (see para. 4.22 above) has identified that new homes within 15km of Cannock Chase SAC would have an adverse effect on its integrity.

**5.18** Cannock Chase District Council's mitigation strategy [See reference 46] states that:

"...the "in combination" impact of proposals involving a net increase of one or more dwellings within a 15 kilometre radius of the SAC would have an adverse effect on its integrity unless avoidance and mitigation measures are in place; with a significantly higher proportion of visitors coming from within 8km.

"...SAC partners have agreed to formally support the Footprint Ecology evidence base reports and acknowledge a 15km Zone of Influence, with financial contributions [to Strategic Access Management and Monitoring Measures; SAMMM] being sought in the 0-8km zone only."

**5.19** Therefore, all residential development within 15km of the SAC (all of Cannock Chase district) is expected to have an in-combination effect on the SAC, but the funding of SAMMM within the 8km zone (most of Cannock Chase district, excluding the southernmost area around Wyrley) is intended to provide sufficient mitigation for all recreation pressure at the SAC.

**5.20** The guidance also makes reference to Policy CP13 in the adopted Local Plan, which states:

"...a development within Cannock Chase District that leads to a net increase in dwellings will be required to mitigate adverse effects. The ongoing work by relevant partner authorities will develop a Mitigation and Implementation Strategy (SPD). This may include contributions to habitat management, access management and visitor infrastructure, publicity, education and awareness raising, provision of Suitable Alternative Natural Green Space (SANGS) within development sites where they can be

accommodated and where they cannot by contributions to off site alternative greenspace, and measures to encourage sustainable travel."

**5.21** The mitigation strategy has been incorporated into the Cannock Chase Developer Contributions SPD [See reference 47], which states:

"The majority of Cannock Chase SAC mitigation measures will be addressed via CIL funds collected from all residential developments (in use class C3, with the exception of affordable housing) across the District. However, where a site is in close proximity to the SAC and/or is proposing any other use (e.g. residential caravans/mobile homes; tourist accommodation) which has the potential to impact upon the SAC, then site and scheme specific SAC issues will be addressed via Planning Obligations where necessary."

"Since adoption of the Local Plan (Part 1) in June 2014, Natural England's advice to the partnership of Local Planning Authorities on the subject of mitigating the adverse effect of developments planned within the acknowledged zone of influence, which could otherwise threaten the integrity of the SAC, has changed. The original focus of the advice was that a combination of habitat and visitor management measures in and around the SAC, plus provision of large areas of Suitable Alternative Natural Green Spaces (SANGS) together with smaller targeted open spaces on medium sized housing developments of 50+ dwellings was required. As a result of further analysis and discussions with the two main landowners of the SAC and its surroundings (Staffordshire County Council and the Forestry Commission) Natural England has produced a set of Strategic Access Management and Mitigation Measures (SAMMM) with a 15 year timeframe comprising increasing on-site presence, development of volunteering and education programmes, car parking and footpath management strategies, physical improvements to paths, implementation of a parking plan, way

marking, interpretation and monitoring. These have been agreed with the Local Planning Authority partners.

In relation to most housing developments in the District, funds collected via CIL to be allocated for these mitigation measures (set out in the SAMMM) will be sufficient to fulfil the Council's obligations under the Habitat Regulations. So that element of Local Plan Policy CP5 which sets out that developments of 50 dwellings or more will be expected to provide additional on-site open space as part of the SAC mitigation strategy and that part of Policy CP13 which identifies SANGS as one element of the overall mitigation strategy will no longer be pursued.

**5.22** The mitigation strategy (residential developer contributions to SAMMM within 8km) is based on a review of planned housing across all neighbouring authorities, at the time the mitigation strategy was developed. Footprint Ecology reviewed [\[See reference 48\]](#) the planned housing numbers across all authorities in 2017 and concluded that:

"...the newly predicted housing figures for the inner 0-8km zone and outer 8-15km still accord with the magnitude of new residential growth that informed the 15% visitor increase and therefore the SAMMM. It is concluded that whilst there are some aspects of the approach that should now be the focus of a full review and upgrade to a more comprehensive strategy in the near future, the approach remains fit for purpose for the currently adopted local plans and the local authorities can continue to have confidence that adverse effects from predicted housing growth figures can still be adequately mitigated for."

**5.23** The 2017 figures for housing in Cannock Chase district that were assessed were:

- Number net new homes completed since April 2011 (excluding sites with full planning permission before April 2011): 239.
- Number net new homes within current planning permissions and adopted local plan allocations as of March 2016: 2,701.
- Other committed capacity incl. draft local plan sites: up to 1,020 (based on SHLAA sites and excluding Rugeley Power Station [\[See reference 49\]](#)).
- Total within 8km: 3,960.
- None within 8-15km zone.

**5.24** The figures in the current Local Plan exceed these: Policy SO3.1 plans for a minimum of 5,516 plus 500 to meet the unmet needs of neighbouring areas. All of the Local Plan allocated sites are within the 8km mitigation zone, although in theory some development (likely small scale) could be permitted within the 8-15km zone in the district.

**5.25** Since the mitigation strategy relies on contributions from developments within 8km to mitigate any net increase in residential development within 15km, assessing the effect of the additional housing within the Local Plan will require a review of the net increase in homes committed to since 2017, within the whole 15km zone of influence. Footprint Ecology's calculations for the resulting percentage increase in visitor numbers at the SAC will need to be revisited and an Assessment made of the effects on the SAC; this work is underway but not yet published.

**5.26** The new Local Plan provides general protection for Cannock Chase SAC within Policy SO7.1 (see paragraph 5.6, above) and more specifically in Policy SO7.3, which states:

"To ensure the Cannock Chase SAC is not harmed, all development that results in a net increase in dwellings within a 15km radius (or any subsequent distance as a result of updated evidence and agreed by Cannock Chase SAC Partnership) of any boundary of Cannock Chase SAC

must take all necessary steps to avoid or mitigate any adverse effects upon the SAC's integrity.

This may include:

- contributions to habitat management and creation;
- access management and visitor infrastructure;
- publicity, education and awareness raising;
- provision of additional recreation space within development sites where they can be accommodated, and where they cannot by contributions to off-site alternative recreation space; and measures to encourage sustainable travel."

**5.27** This acknowledges that the evidence base is likely to be updated by the Cannock Chase SAC Partnership but does not make it clear what measures an applicant must take to avoid adverse effects on the SAC's integrity.

**5.28** This information is set out in the Cannock Chase Developer Contributions SPD (and says that SANGs are no longer being pursued), but it is recommended that it is also incorporated (or made reference to) within Policy SO7.3.

**5.29** At present, there is insufficient evidence to rule out adverse effects on the integrity of Cannock Chase SAC as a result of recreation pressure and urban effects: it is recommended that the evidence base for the mitigation strategy is revisited across the SAC area and policy wording is amended to provide more certainty of action required by applicants.

## Water quantity and quality

**5.30** Effects at Cannock Chase SAC and Cannock Extension Canal SAC could not be ruled out at the screening stage, related to:

- Water quality at Cannock Extension Canal SAC: it is likely that the majority of development in the district will utilise wastewater treatment works in Cannock and Rugeley that are not hydrologically linked to the SACs, but some may discharge to other locations or result in direct run-off (if they are very close; no allocated sites are uphill from / adjacent to Cannock Extension Canal SAC).
- Water quantity at Cannock Chase SAC: demand for drinking water could increase abstraction of groundwater or rivers and development can alter groundwater recharge and run-off rates. MAGIC [See reference 50] shows drinking water abstraction close to Cannock Chase SAC (near the junction of Marquis Drive and the A460) and a Principal aquifer beneath the northern and western parts of Cannock district, including parts of Cannock Chase SAC. This impact is more likely to be relevant to allocated sites north of Hednesford.

**5.31** Policies SO7.1 and SO7.3 provide general protection for the SACs, and SO7.3 states:

"Any development within the water catchment area of the Cannock Extension Canal SAC will be deemed to have an adverse impact on the Cannock Extension Canal SAC. Mitigation for any identified adverse effects must be demonstrated and secured prior to approval of development and ongoing monitoring of impact on the SAC will be required.

Developments outside the water catchment area may be required to demonstrate that they will have no adverse effect on the integrity of the SAC."

**5.32** Two other policies also seek to reduce the effects of major development (ten or more homes, or sites greater than one hectare) on the water environment.

**5.33** Policy SO8.4 states that:

"All major development proposals will:

- Incorporate sustainable water management measures to reduce water use, and increase its reuse, minimise surface water run-off, and ensure that it does not increase flood risks or impact water quality elsewhere.
- Reduce the risk of flooding and maximise flood protection by including features such as trees and planting, water bodies, retention ponds and filter beds, and permeable paving. Surface drainage requirements should work with the local topography to create low maintenance sustainable drainage systems."

**5.34** Policy SO8.5 states that:

"All major development proposals will:

- Set out how any air, water, soil, noise and light pollution that may arise from the development will be avoided (or, if it is not possible to avoid the pollution, mitigated);
- Protect (and where appropriate enhance and restore) water quality. Development will not be permitted without confirmation that the existing or improved sewage and wastewater treatment facilities can accommodate the new development."

**5.35** The Local Plan policies provide sufficient safeguards to avoid or mitigate any potential water quality effects at Cannock Extension Canal SAC (e.g. from development outside allocated sites but close to the canal).

**5.36** It is likely that they would also provide sufficient safeguards for changes in land use or run off that could affect groundwater recharge, in proximity to the Cannock Chase SAC.

**5.37** Although there is insufficient information on the cumulative impact of growth in the vicinity of Cannock Chase SAC on drinking water, any water abstraction is regulated by the Environment Agency. This takes into account environmental impacts including likely significant effects on European sites.

**5.38** As an additional safeguard, it is recommended that Policy SO8.5 is updated to require major developments to confirm capacity to supply drinking water as well as sewage / wastewater treatment.

**5.39** It is therefore considered that there will be no adverse effects on the integrity of any European sites as a result of changes in water quantity or quality, as a result of the Local Plan.

## Chapter 6

### Conclusions and Next Steps

#### Findings at this stage of HRA and information required prior to the next stage

**6.1** This HRA has considered potential effects on all European sites within 15km of Cannock Chase district. Four types of effect (physical habitat loss, air pollution from vehicle traffic, recreation pressure and urban effects, and water quantity/quality) were identified as having potentially significant effects at the Screening stage and subject to Appropriate Assessment. It has been possible to rule out adverse effects on the integrity of European sites in relation to physical loss of habitat and water quantity/quality, due to safeguards provided within Local Plan policies. Adverse effects on integrity have not been able to be ruled out in relation to:

- Air pollution from vehicles at Cannock Chase SAC, Cannock Extension Canal SAC and West Midland Mosses SAC: traffic data is required.
- Recreation pressure and urban effects at Cannock Chase SAC: mitigation strategy evidence base needs to be updated and policy wording strengthened.

**6.2** Traffic data will need to show current traffic flows (AADT for all traffic and for HDVs) and flows at the end of the Plan period (with and without Plan development), for each of the roads (A513, A460, A5 and A518) where they pass Cannock Chase SAC, Cannock Extension Canal SAC and West Midland Mosses SAC. If this data shows increases of more than 1,000 AADT or 200 HDV, then air quality assessment may be required.

**6.3** In relation to recreation pressure at Cannock Chase, assessing the effect of the additional housing within the Local Plan will require a review of the net increase in homes committed to since 2017, within the whole 15km zone of influence. Footprint Ecology's calculations for the resulting percentage increase in visitor numbers at the SAC will then need to be revisited and an Assessment made of the effects on the SAC.

**6.4** This HRA report will be published for consultation alongside the draft Local Plan preferred options. Following receipt of any consultation responses (for example from Natural England) and the required traffic data and housing calculations, the HRA will be updated for the assessment of the proposed submission version of the Local Plan (Regulation 19 consultation).

## Appendix A

# Attributes of European sites with the potential to be affected by the Local Plan

**A.1** This appendix contains information about the European sites scoped into the HRA. Information about each site's area, the site descriptions, qualifying features and pressures and threats are drawn from Natural England's Site Improvement Plans (SIPs) and the Standard Data Forms or Ramsar Information Sheets available from the JNCC website. Site conservation objectives are drawn from Natural England's website and are only available for SACs and SPAs.

## Cannock Chase SAC

(1,244.2ha)

### Qualifying Features

- H4030 European dry heaths
- H4010 Northern Atlantic wet heaths with *Erica tetralix*

### Conservation Objectives

- 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;

## Appendix A Attributes of European sites with the potential to be affected by the Local Plan

- The extent and distribution of qualifying natural habitats.
- The structure and function (including typical species) of qualifying natural habitats, and,
- The supporting processes on which the qualifying natural habitats rely.

## Key Vulnerabilities

- Undergrazing - needs conservation grazing by appropriate animals to build on the restoration of the dry and wet heathland habitats and address a number of management issues. Grazing animals such as cattle will diversify the physical structure of the heathland habitats by creating habitat mosaics across the site that in turn will benefit the special fauna at Cannock Chase
- Drainage - The water supply to the wetland habitats needs further investigation and there are artificial, historic drainage structures in the Oldacre Valley that need to be assessed to establish their impact on the wetland vegetation.
- Hydrological Changes - There has been a reduction in the extent of the valley mire and changes in the vegetation in the Sher Brook Valley which indicate a move towards a drier wetland vegetation.
- Disease - The fungal plant disease *Phytophthora pseudosyringae* is widespread on several parts of the main body of the Chase, affecting bilberry, a major part of the heathland vegetation.
- Air pollution: impact of atmospheric nitrogen deposition - Nitrogen deposition on Cannock Chase Special Area of Conservation currently exceeds the relevant critical loads for the site. Possible effects of this seen on the ground include an increase in bramble across the site and a shorter *Calluna vulgaris* lifecycle resulting in the plants ageing faster.
- Wildfire / arson - Accidental and deliberate fires have caused massive damage to Cannock Chase over the decades.
- Invasive species - A range of invasive species are present on the SAC and on surrounding land.

## Non-qualifying habitats and species on which the qualifying habitats and/or species depend

- Dry heathland – *Calluna vulgaris*, *Ulex gallii*, *Calluna vulgaris* and *Deschampsia flexuosa* heaths.
- Within the heathland, species of northern latitudes occur, such as cowberry *Vaccinium vitis-idaea* and crowberry *Empetrum nigrum*.
- Cannock Chase has the main British population of the hybrid bilberry *Vaccinium intermedium*, a plant of restricted occurrence. There are important populations of butterflies and beetles, as well as European nightjar *Caprimulgus europaeus* and five species of bats.

## Cannock Extension Canal SAC

(5ha)

### Qualifying Features

- S1831. Floating water-plantain *Luronium natans*

### Conservation Objectives

- 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;
  - The extent and distribution of the habitats of qualifying species
  - The structure and function of the habitats of qualifying species
  - The supporting processes on the habitats of qualifying species rely

## Appendix A Attributes of European sites with the potential to be affected by the Local Plan

- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

## Key Vulnerabilities

- Water Pollution - Historic sediment loads into the canal have occurred.
- Overgrazing - Large groups of Canada geese are grazing on the water plants in the canal. There is a risk that this could affect the vegetation community including Floating water-plantain as well as contributing additional nutrients via excreta.
- Invasive species - Water fern *Azolla filiculoides* and Water pennywort *Hydrocotyle ranunculoides* have been present on the canal in the recent past.
- Air Pollution: risk of atmospheric nitrogen deposition - Nitrogen deposition exceeds site relevant critical load.

## Non-qualifying habitats and species on which the qualifying habitats and/or species depend

- Cannock Extension Canal in central England is an example of anthropogenic, lowland habitat supporting floating water-plantain *Luronium natans* at the eastern limit of the plant's natural distribution in England. A very large population of the species occurs in the Canal, which has a diverse aquatic flora and rich dragonfly fauna, indicative of good water quality. The low volume of boat traffic on this terminal branch of the Wyrley and Essington Canal has allowed open-water plants, including floating water-plantain, to flourish, while depressing the growth of emergents.

## West Midlands Mosses SAC

(184.62ha)

## Qualifying Features

- H3160. Natural dystrophic lakes and ponds
- H7140. Transition mires and quaking bogs

## Conservation Objectives

- 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;
  - The extent and distribution of qualifying natural habitats.
  - The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely.

## Key Vulnerabilities

- Water Pollution - On each of the component sites (i.e. Clarepool Moss, Wybunbury Moss, Abbots Moss, and Chartley Moss) the features have been historically impacted by, and remain vulnerable to, changes in water quality and nutrient enrichment from their surrounding catchment. Dystrophic pools at Abbots Moss currently fail to meet their water quality objectives whilst those at Clarepool Moss require testing.
- Hydrological changes - All of the component areas of transition mire are impacted by historic drainage. At Clarepool, Chartley and Wybunbury Mosses some of this damage has been partially repaired but further measures to restore a naturalised hydrology are needed in all locations. As well as surface water, ground water is also an important water supply mechanism to the mosses. Hence the SAC is vulnerable to groundwater abstractions and artificial flooding as well as catchment drainage.

## **Appendix A** Attributes of European sites with the potential to be affected by the Local Plan

- Air Pollution: impact of atmospheric nitrogen deposition - Nitrogen deposition exceeds site relevant critical loads.
- Inappropriate scrub control - The transition mire habitat at each of the component sites experiences continual re-colonisation by scrub, typically birch and pine as a consequence of past hydrological change e.g. historical drainage and cumulative nutrient enrichment together with readily available seed sources. The presence of excessive amounts of scrub and trees affects the mire habitat by increasing the rate of drying out and by the addition of nutrients.
- Game management: pheasant rearing - Nutrient enrichment in the areas of pheasant pens and disturbance to ground flora from game birds are a local issue at Clarepool and Chartley Mosses. Erosion may be caused by shoot activities and access restrictions due to shooting can restrict rewetting and conservation management activities.
- Forestry and woodland management - restocking of land in close proximity to Abbots Moss could cause shade, nutrient enrichment and enhanced evapotranspiration and serve as an undesirable seed source for scrub (e.g. Pine) encroachment.
- Habitat fragmentation - The sites are small and geographically isolated from each other. The threat of localised species extinction is greater and so the chances of recolonisation by lost species is very low. An example of this is provided by the extinction from Abbots Moss and Wybunbury Moss in recent decades of the white-faced darter dragonfly, a species dependent on dystrophic pools. The nearest donor population is more than 20 miles away.

## **Non-qualifying habitats and species on which the qualifying habitats and/or species depend**

- The lake at Clarepool Moss is unusual as a dystrophic type on account of its relatively base-rich character, which is reflected in the presence of a diverse fauna and flora. The two at Abbots Moss are more typical, base-poor examples. The dystrophic lakes and ponds at this site are associated

## Appendix A Attributes of European sites with the potential to be affected by the Local Plan

with Schwingmoor development, a characteristic of this habitat type in the West Midlands. Schwingmoor is an advancing floating raft of bog-moss Sphagnum, often containing NVC type M3 Eriophorum angustifolium bog pool community, which grows from the edge of the pool and can completely cover over the pool;

- Floating rafts of Sphagnum-dominated vegetation have developed over semi-liquid substrates within basins. In the UK this type of Sphagnum-dominated vegetation with a scatter of sedges Carex species and cranberry Vaccinium oxycoccos is confined to this part of England and mid-Wales.

## Midland Meres and Mosses (Phase 1) Ramsar Site

(510.88ha)

### Qualifying Features

- Ramsar criterion 1a – a particularly good example of a natural or near natural wetland, characteristic of this biogeographical region, The site comprises the full range of habitats from open water to raised bog.
- Ramsar criterion 2a - supports a number of rare species of plants associated with wetlands. The site contains the nationally scarce six-stamened waterwort *Elatine hexandra*, needle spike-rush *Eleocharis acicularis*, cowbane *Cicuta virosa*, marsh fern *Thelypteris palustris* and elongated sedge *Carex elongate*.
- Ramsar criterion 2a - Contains an assemblage of invertebrates, including the following rare wetland species. 3 species considered to be endangered in Britain, the caddis fly *Hagenella clathrata*, the fly *Limnophila fasciata* and the spider *Cararita limnaea*. Other wetland Red Data Book species are; the beetles *Lathrobium rufipenne* and *Donacia aquatica*, the flies

## Appendix A Attributes of European sites with the potential to be affected by the Local Plan

Prionocera pubescens and Gonomyia abbreviata and the spider Sitticus floricola.

## Conservation Objectives

- Ramsar criterion – peatland.
- The conservation objectives for the site are to maintain in favourable condition the habitat types for which the site is designated.

## Key Vulnerabilities

- Invasive species - considered a major impact on this site.
- Water quality - eutrophication is considered a major impact on this site.
- Recreational pressure and disturbance - in line with other bog and mire habitats, trampling and erosion are likely to be a significant issue where public access occurs.
- Water quality - declines in water quality through nutrient enrichment and sediment.
- Land use in surrounding areas - agricultural practices and urban runoff are likely to affect the scattered sites through nutrient enrichment and sedimentation.

## Non-qualifying habitats and species on which the qualifying habitats and/or species depend

- The qualifying features are depended on the site's range of wetland habitats (also qualifying features), including those designated as the SAC.

## Pasturefields Salt Marsh SAC

(7.8ha)

### Qualifying Features

- 1340. Inland salt meadows

### Conservation Objectives

- 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;
  - The extent and distribution of qualifying natural habitats
  - The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely.

### Key Vulnerabilities

- No issues affecting the Natura 2000 feature(s) have been identified on this site.

### Non-qualifying habitats and species on which the qualifying habitats and/or species depend

Pasturefields Salt Marsh is the only known remaining example in the UK of a natural salt spring with inland saltmarsh vegetation. The vegetation consists of

## Appendix A Attributes of European sites with the potential to be affected by the Local Plan

red fescue *Festuca rubra*, with common saltmarsh-grass *Puccinellia maritima*, lesser sea-spurrey *Spergularia marina*, saltmarsh rush *Juncus gerardii* and sea arrowgrass *Triglochin maritimum* in the most saline situations.

This extremely rare habitat contains a number of halophytic plants and is locally important for breeding waders including:

- Snipe, *Gallinago gallinago*
  - Habitat preference: grassland, heathland, moorland, freshwater, farmland, and coastal wetlands
  - Diet: insects, earthworms and crustaceans in the mud.
- Common redshank, *Tringa totanus*
  - Habitat preference: rivers, wet grassland, moors and estuaries.
  - Diet: invertebrates, especially earthworms, crane fly larvae (inland) crustaceans, molluscs, marine worms (estuaries).
- Lapwing, *Vanellus vanellus*
  - Habitat preference: breeding season prefer spring sown cereals, root crops, permanent unimproved pasture, meadows and fallow fields. They can also be found on wetlands with short vegetation. In winter they flock on pasture and ploughed fields
  - Diet: worms and insects

## Mottley Meadows SAC

(43.7ha)

### Qualifying Features

- 6510 Lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*)

## Conservation Objectives

- 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;
  - The extent and distribution of qualifying natural habitats
  - The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely.

## Key Vulnerabilities

- Water Pollution - The hay meadow community type is reliant on a clean water supply. However both the local groundwater and the local watercourse which floods occasionally are enriched with excess nutrients. The source of the nutrient enrichment is thought to stem from the adjacent dairy farms, maize crops, run off, and leachates. Excess nutrients enable more vigorous plant species to take over reducing the biodiversity value of the MG4 grassland.
- Hydrological changes - MG4 and MG8 grassland have precise hydrological requirements, climate change could cause flooding and drought, both would have a detrimental impact on the features.
- Water abstraction - The Whiston Brook catchment appears to be affected by over abstraction; trickle irrigation has been highlighted as one of the main reasons for this with much of the catchment being used to grow soft fruit. The MG8 and MG4 grassland types are sensitive to water level changes.
- Change in land management - Annual hay cut and aftermath grazing are essential management requirements for the MG4 and MG8 grassland.

## Non-qualifying habitats and species on which the qualifying habitats and/or species depend

- The site contains grassland with limited influence of agricultural intensification and so demonstrates good conservation of structure and function. There are transitions to other dry and wet grassland types. The site is important for a range of rare meadow species, including fritillary *Fritillaria meleagris* at its most northerly native locality.

## River Mease SAC

(23.03ha)

### Qualifying Features

- 3260 Water courses of plain to montane levels with the *Ranunculus fluitantis* and *Callitriche-Batrachion* vegetation
- 1149 Spined loach *Cobitis taenia*
- 1163 Bullhead *Cottus gobio*
- 1092 White-clawed (or Atlantic stream) crayfish *Austropotamobius pallipes*
- 1355 Otter *Lutra lutra*

### Conservation Objectives

- 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;
  - The extent and distribution of qualifying natural habitats and habitats of qualifying species

## Appendix A Attributes of European sites with the potential to be affected by the Local Plan

- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

## Key Vulnerabilities

- Water pollution – Increased water pollution can lead to increased algal growth and a subsequent decline in habitat quality. Some phosphate stripping has been carried out, however further reductions are desirable. Discharges from septic tanks are thought to be one source of pollution, and requires fuller understanding, as well as sources of high levels of ammonia that impact species.
- Drainage - The SAC is under pressure from drainage, which affects the naturalised flow pattern, leading to a more 'flashy' river. Roads act as conduits for drainage flows. As such, SuDS should be required at all new development schemes.
- Inappropriate weirs, dams and other structures -These can restrict species population size and distribution, and prevent fish movement. To be dealt with through the River Restoration Plan.
- Invasive species - The SAC is under pressure from invasive species, including Himalayan balsam, Japanese knotweed and American signal crayfish (which carry a crayfish plague).
- Siltation - The SAC is under pressure from siltation, which impacts the spawning habitat of the bullhead and spined loach.
- Water abstraction - The SAC is under pressure from water abstraction, which changes the naturalised flow pattern. Sources include regulated

## Appendix A Attributes of European sites with the potential to be affected by the Local Plan

agriculture-related abstraction, transfer to the Ashby canal and 11 sewage treatment works within the catchment area.

### Non-qualifying habitats and species on which the qualifying habitats and/or species depend

- Watercourses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation
  - Habitat: The River Mease SAC supports good examples of water plants from the Ranunculion fluitantis and Callitriche-Batrachion vegetation (Rivers with floating vegetation often dominated by watercress). Submerged aquatic vegetation is varied, particularly in the lower reaches of the river, and is characterised by frequent river water-cress *Ranunculus fluitans*, common watercress *R. aquatilis*, blunt-leaved pondweed *Potamogeton obtusifolius*, fennel pondweed *P. pectinatus*, arrowhead *Sagittaria sagittifolia* and yellow water-lily *Nuphar lutea*.
- Spined loach *Cobitis taenia*
  - Habitat: optimum habitat consists of sandy substrates with plenty of dense macrophytes interspersed with open sandy areas.
  - Diet: at night they they consume sand on the riverbed and with it small animals and other organic material.
- Bullhead *Cottus gobio*
  - Habitat: appears to favour fast-flowing, clear shallow water with a hard substrate (gravel/cobble/pebble) and is frequently found in the headwaters of upland streams. However, it also occurs in lowland situations on softer substrates so long as the water is well-oxygenated and there is sufficient cover. It is not found in badly polluted rivers.
- White-clawed (or Atlantic stream) crayfish *Austropotamobius pallipes*
  - Habitat: The white-clawed crayfish lives in a diverse variety of clean aquatic habitats but especially favours hard-water streams and rivers.

## Appendix A Attributes of European sites with the potential to be affected by the Local Plan

- A major threat to the native white-clawed crayfish is posed by the introduction of non-native species of crayfish, which have been farmed in Britain since the late 1970s. It is believed that disease was introduced and is spread by the most frequently farmed species, the North American signal crayfish *Pacifastacus leniusculus*, a carrier of the disease. Crayfish plague can be introduced into a waterbody not only by entry of signal crayfish but also by water, fish or equipment that has been in contact with signals. This greatly increases the risk to remaining white-clawed crayfish populations.
- Otter *Lutra lutra*
  - Habitat: Otters are semi aquatic, living mainly along rivers. Otters can travel widely over large areas. Some are known to use 20 km or more of river habitat. Otters tend to live alone as they are very territorial. The Otter is also a 'European Protected Species' in the UK, and it is an offence to disturb, capture, injure or kill an otter (either on purpose or by not taking enough care), or to damage, destroy or obstruct access to its breeding or resting places, without first getting a Licence.
  - Diet: They mainly eat fish, though crustaceans, frogs, voles and aquatic birds may also be taken. Being at the top of the food chain, an otter needs to eat up to 15% of its body weight in fish daily.

## **Appendix B**

# Review of Potential for In-combination Effects with other Plans and Projects

## **Local Plans**

Staffordshire Local Transport Plan 2011 to 2026 [\[See reference 51\]](#)

Cannock Chase District Integrated Transport Strategy 2013-2028 (November 2013) [\[See reference 52\]](#)

Cannock Chase District lies within the Staffordshire County area.

The Local Transport Plan sets out the transport strategy and policies for the county, including Policy 7.8 which seeks to protect internationally significant nature conservation sites by supporting measures to maintain the integrity of the sites, requiring any new scheme to demonstrate that it will avoid adverse effects on their integrity, supporting a limit on the levels of boat traffic on the Cannock Extension Canal, and promoting monitoring of air pollution and recreational pressure.

Integrated transport strategies for each of the eight districts and boroughs within Staffordshire sit alongside the Local Transport Plan. These identify local transport issues, opportunities, and proposed transport improvements.

## Minerals Local Plan for Staffordshire 2015-2030 (adopted February 2017)

The Minerals Local Plan identifies suitable land for minerals extraction and provides the policies against which planning applications for mineral extraction or processing will be determined.

Cannock Chase District contains sand and gravel quarries and the southern part of the District falls within a Mineral Safeguarding Area.

## Staffordshire and Stoke-on-Trent Joint Waste Local Plan 2010-2026 (adopted March 2013)

The Joint Waste Local Plan sets out the strategy for waste management in the County and Stoke on Trent, and provides the policies against which planning applications for waste management will be determined.

Waste management could result in changes to vehicle flows (e.g. HGVs) and changes to air quality (e.g. from vehicle emissions or incineration).

## The Plan for Stafford Borough (adopted June 2014) [\[See reference 53\]](#)

## Plan for Stafford Borough: Part 2 (adopted January 2017) [\[See reference 54\]](#)

Stafford lies to the North West of Cannock Chase.

## **Appendix B** Review of Potential for In-combination Effects with other Plans and Projects

The Plan for Stafford Borough contains a vision, spatial principles and specific policies to guide development across the Borough. Part 2 of the Plan for Stafford Borough sets out boundaries for a number of main settlements and for Recognised Industrial Estates, along with accompanying policies. Part 2 was submitted to the Secretary of State in April 2016 for Examination and, following modifications, was adopted in January 2017.

### **Housing Development**

Policy SP2 makes provision for the development of 500 homes per year over the Plan period, which totals 10,000 between 2011 and 2031. Policy SP4 specifies that this growth will be distributed as follows:

- Stafford – 70%
- Stone – 10%
- Key Service Villages – 12%
- Rest of Borough area – 8%

### **Employment Development**

Policy SP2 makes provision for the development of 8ha of employment land per year over the Plan period, which totals 16,000ha between 2011 and 2031.

Policy SP5 specifies that this growth will be distributed as follows:

- Stafford – 56%
- Stone – 12%
- Rest of Borough area – 32%

## Lichfield District Local Plan Strategy 2008-2029 (adopted February 2015) [\[See reference 55\]](#)

## Lichfield District Local Plan Allocations 2008-2029 (adopted July 2019) [\[See reference 56\]](#)

Lichfield lies to the east of Cannock Chase.

### Housing Development

Core Policy 1 specifies that a minimum of 10,030 new homes will be delivered between 2008 and 2029 with growth being focussed at the most accessible and sustainable locations as set out in the Settlement Hierarchy which distributes housing development as follows:

- Lichfield – 38%
- Burntwood – 13%
- Rugeley – 11%
- Tamworth – 10%
- Fradley – 12%
- Fazeley, Shenstone and Armitage with Handsacre – 16%

### Employment Development

Core Policy 7 specifies that 79.1ha of employment land will be allocated including approximately 12ha within the Cricket Lane strategic development allocation. Around 10 additional hectares of land will be defined by the Local Plan Allocations document to ensure flexibility of provision.

## Black Country Core Strategy (adopted February 2011) [See reference 57]

The four Black Country Local Authorities of Dudley, Sandwell, Walsall and Wolverhampton have prepared a Core Strategy for the Black Country which was adopted in February 2011. This forms the basis of Walsall's and Wolverhampton's Local Development Framework.

## Black Country Core Strategy – Issues & Options Report (June 2017)

The Issues & Options report is the first stage of the formal review of the Black Country Core Strategy to ensure the spatial objectives and strategy are being effectively delivered and to keep the plan up-to-date in line with national planning guidance.

Walsall lies to the southeast of Cannock Chase and is one of the four Black Country Local Authorities.

The Black Country Core Strategy also applies to Wolverhampton, which is not adjacent to Cannock Chase but a significant part of it lies within 15km of Cannock Chase SAC. Wolverhampton lies southwest of Cannock Chase.

## Housing Development

Policy HOU1 specifies that at least 63,000 homes will be developed across the whole Plan area between 2006 and 2026. At least 95% of these homes will be developed on previously developed land. Of this total figure, 11,973 new homes will be located within Walsall Borough and 13,411 new homes will be located within Wolverhampton.

## **Appendix B** Review of Potential for In-combination Effects with other Plans and Projects

The Issues & Options report finds that the Black Country is currently 3,000 homes behind Core Strategy targets, and the SHMA carried out in 2017 concluded that the local housing need (OAN) for the Black Country over the period 2014-36 is 78,190 homes. Further land, beyond the existing spatial strategy, will be required to provide 22-25,000 new homes. The two proposed options are: 1) 'rounding off' the Green Belt and identifying small-medium sized sites; or 2) a more focussed approach that identifies a limited number of SUEs

### Employment Development

Policy EMP1 specifies that 2,900ha of employment land will be provided across the whole Plan area between 2006 and 2026. Walsall is to provide a total of at least 611 ha employment land stock by 2026 and Wolverhampton is to provide at least 645 ha employment land stock by 2026. Policy EMP4 states that Walsall should have 46ha and Wolverhampton should have 41ha employment land readily available at any one time.

The Issues & Options report notes that an Economic Development Needs Assessment (EDNA) carried out for the Black Country during 2016-17 recommends that the review should plan for up to 800 ha of additional land to meet the needs of the region for the period 2015-36. Further land, beyond the existing spatial strategy, will be required to provide up to 300 ha of new employment land. The plan suggests a number of spatial options for accommodating this growth.

### Walsall Site Allocation Document (adopted January 2019) [\[See reference 58\]](#)

Walsall lies to the southeast of Cannock Chase. The site allocations document adds further detail to the Black Country Core Strategy by allocating specific sites in Walsall.

## Housing Development

The Site Allocation Document specifies that 11,973 new homes will be located within Walsall Borough. Policy HC1 affirms that each site allocation will achieve a density of at least 35 dwellings per hectare.

## Employment Development

The Site Allocation Document specifies that a minimum of 46ha of employment land will be available at any one time within Walsall Borough, in line with the Black Country Core Strategy.

## South Staffordshire Core Strategy (adopted December 2012) [\[See reference 59\]](#)

South Staffordshire lies to the west of Cannock Chase.

## Housing Development

Core Policy 6 specifies that a minimum of 3,850 homes will be delivered between 2006 and 2028. The Council will also ensure that a sufficient supply of deliverable/developable land is available to deliver 175 new homes each year informed by the District housing trajectory.

The balance of new housing development (1,606 homes rounded to 1,610) will be distributed as follows:

- Northern Area – 370 dwellings (23%)
- North Western Area – 129 dwellings (8%)
- North Eastern Area – 226 dwellings (14%)

## Appendix B Review of Potential for In-combination Effects with other Plans and Projects

- Central Area – 515 dwellings (32%)
- Southern Area – 370 dwellings (23%)

## Employment Development

Core Policy 7 affirms that the Council will support measures to sustain and develop the local economy of South Staffordshire. This will focus on four freestanding strategic employment sites: i54, Hilton Cross, ROF Featherstone/Brinsford and Four Ashes.

## South Staffordshire Site Allocations Document (adopted September 2018) [See reference 60]

South Staffordshire lies to the west of Cannock Chase.

## Housing Development

The Site Allocations Document (SAD) reviewed existing permissions and housing development since the Core Strategy and concluded that the SAD needs to allocate a residual 993 dwellings. Policy SAD2 presents minimum housing allocations that would provide a minimum of 1,070 dwellings, distributed between the following settlements:

- Bilbrook (102)
- Brewood (74)

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Local Plans

- Cheslyn Hay 63)

## Appendix B Review of Potential for In-combination Effects with other Plans and Projects

- Codsall (210)
- Coven (40)
- Featherstone (60)
- Great Wyrley (95)
- Kinver (60)
- Swindon (10)
- Wheaton Aston (15)
- Wombourne 179)

## Employment Development

Employment development must conform to the Core Strategy.

Policy SAD5 presents the employment land allocations, which proposed a 40ha extension to i54 and an up to 12ha of additional employment land plus an additional 10ha employment land within the existing development boundary, totalling an additional 62ha employment land.

## East Staffordshire Local Plan (adopted October 2015) [See reference 61]

East Staffordshire lies to the northeast of Cannock Chase. It does not adjoin Cannock Chase but a significant part of it lies within 15km of Cannock Chase SAC.

## Housing Development

Strategic Policy 3 makes provision for the development of 11,648 dwellings over the plan period of 2012-2031. The housing requirement will be delivered in accordance with the following indicative average annual rate:

- 466 dwellings per annum for 6 years (2012/2013-2017/2018)
- 682 dwellings per annum for 13 years (2018/2019-2030/2031)

## Employment Development

Strategic Policy 3 makes provision for the development of 40 hectares of employment land which consists of 30 hectares of new provision B1, B2 and B8 employment land and a continuation of 10 hectares of B1, B2 and B8 employment land.

## North Warwickshire Local Plan (submitted Mar 2018 – under revision in Sep 2020) [See reference 62]

North Warwickshire lies approximately 22km to the east of Cannock Chase. As such it does not adjoin Cannock Chase. These districts are however linked by the A5. Furthermore, the HRA for the Draft Submission North Warwickshire Local Plan could not rule out impacts on the Cannock Extension Canal SAC in relation to air pollution and as such there is potential for in-combination effects on this site.

## Housing Development

Policy LP6 sets out that up to 2033 a minimum of 5808 dwellings (net) will be built in the District. There is an aspiration to deliver a further 3790 dwellings on top of this minimum amount of housing development over this period of time.

## **Appendix B** Review of Potential for In-combination Effects with other Plans and Projects

Between 2011 and 2028, nine residential and five transit Gypsy and Traveller pitches will also be delivered.

## **Employment Development**

Policy LP6 also states that around 100 hectares of employment land will be required over the plan period.

### **Examination and consultation 2020:**

It is aiming to provide over 6800 homes and an additional 40 hectares of employment land. These will primarily be located in Polesworth, Dordon and Atherstone along the A5 corridor with other growth at Ansley Common and Hartshill.

#### **B.1**

# Appendix C

## Screening Matrices

The first part of this appendix shows which types of impacts on European sites could potentially result from each of the policies and site allocations in the Cannock Chase Local Plan. The policies that are not expected to have a particular type of impact are listed first. These are followed by the policies that could have a certain type of impact.

If a policy could provide mitigation for adverse effects of European sites, this is identified in a paragraph at the end of such policy.

### Policies not expected to have a particular type of impact

#### Policy SO1.1: Protecting, Conserving and Enhancing the Distinctive Local Historic Environment

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy will not result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

## Policy SO1.2: Enhancing the Quality of the Built Environment

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy sets principles for design but will not result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

## Policy SO1.3: Creating Safe Places Which Deter Crime and Reduce the Fear of Crime

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy sets principles for design but will not result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

## Policy SO2.1: Safeguarding the Provision of Community Infrastructure

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy safeguards existing community infrastructure but will not result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

## Policy SO2.2: Safeguarding Health and Amenity

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy sets principles for design but will not itself result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

## Policy SO2.4: Providing Opportunities for Healthy Living and Activity

Likely activities (operation) to result as a consequence of the proposal:

- Green infrastructure (within major development)
- Sports/fitness infrastructure (within major development)

Type of adverse effect that could arise from likely activities:

- Recreation pressure

Does the policy need to be screened into the Appropriate Assessment?

- No – improving green infrastructure could in theory increase trips to European sites from residential development, but the contribution of this within major developments is likely to be minor compared with the presence of new homes themselves (assessed in relation to Policy SO3.1).
- Policy SO2.3 is the main policy relating to sports provision in major developments and this policy supports but does not significantly add to that; therefore, does not need to be assessed separately.

## Policy SO2.5: Allotments and Community Food Growing

Likely activities (operation) to result as a consequence of the proposal:

- Allotments and community food growing sites

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

## Appendix C Screening Matrices

- No

### Policy SO3.2: Housing Choice

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy sets out desired housing mix for new development but will not itself result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

### Policy SO3.3: Delivering High Quality Housing

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy sets out design principles for new development but will not itself result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

## Policy SO4.1: Safeguarding Existing Employment Areas for Employment Uses

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy safeguards existing employment areas but will not itself result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

## Policy SO4.4: Live Work Units

Likely activities (operation) to result as a consequence of the proposal:

- Employment development
- Changes in water abstraction / discharge
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Changes in water quality/quantity

Does the policy need to be screened into the Appropriate Assessment?

- No – this policy allows live-work spaces within residential areas, but this is unlikely to result in significant effects beyond those already generated by residential development.

This policy (SO4.4) may also reduce the requirement for travel within the Plan area and therefore contribute towards mitigation for air pollution impacts.

## Policy SO4.5: Provision for Local Employment and Skills

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy will not result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

## Policy SO5.1: Accessible Development

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy sets out design principles for new development but will not itself result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

## Policy SO5.2: Communication Technologies

Likely activities (operation) to result as a consequence of the proposal:

- Communications infrastructure

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

This policy (SO5.2) may also indirectly reduce the requirement for travel within the Plan area and therefore contribute towards mitigation for air pollution impacts.

## Policy SO5.3: Low and Zero Carbon Transport

Likely activities (operation) to result as a consequence of the proposal:

- Sustainable transport facilities (within major development)
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

This policy (SO5.3) aims to reduce the requirement for travel within the Plan area and therefore contribute towards mitigation for air pollution impacts.

## Policy SO5.4: Maintaining and Improving the Transport System

Likely activities (operation) to result as a consequence of the proposal:

- Changes in vehicle traffic and other forms of travel

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

This policy (SO5.4) seeks to encourage sustainable travel and reduce pollution from transport and may therefore contribute towards mitigation for air pollution impacts.

## Policy SO5.5: Hatherton Canal Restoration Corridor

Likely activities (operation) to result as a consequence of the proposal:

- Green and blue infrastructure

Type of adverse effect that could arise from likely activities:

- Recreation pressure

## Appendix C Screening Matrices

Does the policy need to be screened into the Appropriate Assessment?

- No – this project could in theory increase visits to the Cannock Extension Canal SAC, 5km from Hatherton Canal but linked via the canal network, but this SAC is not sensitive to recreation pressure.

### **Policy SO5.6: Safeguarding Proposed Recreational Footpath and Cycle Routes**

Likely activities (operation) to result as a consequence of the proposal:

- Walking and cycling infrastructure

Type of adverse effect that could arise from likely activities:

- Recreation pressure

Does the policy need to be screened into the Appropriate Assessment?

- No – these proposals are not close enough to Cannock Chase SAC to significantly increase visitor numbers there and are may also contribute to a reduction in vehicle trips within the Plan area.

### **Policy SO5.7: Parking Provision**

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy requires major developments to consider parking provision but will not itself result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

## Appendix C Screening Matrices

- No

### Policy SO6.1 Hierarchy of Town and Local Centres

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy defines the hierarchy of town and local centres but will not itself result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

### Policy SO6.2: Provision of Main Town Centre Uses and Town Centre Services

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy seeks to maintain the viability of town centre uses and retail, but will not itself result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

### Policy SO6.3: Safeguarding Existing Town Centre Services

Likely activities (operation) to result as a consequence of the proposal:

- Changes of use within retail areas
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Air pollution

Does the policy need to be screened into the Appropriate Assessment?

- No – changes of use in buildings within existing town centres are unlikely to result in significant changes in vehicle traffic past European sites.

### Policy SO6.4: Town Centre Design

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy sets principles for design but will not itself result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

## Policy SO7.1: Protecting, Conserving and Enhancing Biodiversity and Geodiversity

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy will not result in new development / activities

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

This policy (SO7.1) requires developments to protect designated sites including Special Areas of Conservation and Sites of Special Scientific Interest. Developments that harm these sites will only be permitted in exceptional circumstances (no suitable alternatives; IROPI; compensation secured). This policy provides general protection for European sites (SACs specifically and SPA/Ramsar indirectly).

## Policy SO7.2: Biodiversity Net Gain

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy will not result in new development / activities

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

## Appendix C Screening Matrices

- No

This policy (SO7.2) seeks biodiversity net gain which will may contribute indirectly to biodiversity protection and enhancement within European sites.

### Policy SO7.3: Special Areas of Conservation

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy will not result in new development / activities

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

This policy (SO7.3) provides specific protection for Cannock Chase SAC and Cannock Chase Extension Canal SAC and requires developments to avoid or mitigate adverse effects if they are within 15km of Cannock Chase SAC or' within the water catchment area of' Cannock Extension Canal SAC.

### Policy SO7.4: Protecting, Conserving and Enhancing Landscape Character

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy will not result in new development / activities

## Appendix C Screening Matrices

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

### **Policy SO7.5: Protecting, Conserving and Enhancing the Cannock Chase Area of Outstanding Natural Beauty**

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy will not result in new development / activities

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

### **Policy SO7.6: Protecting, Conserving and Enhancing the Green Belt**

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy seeks to protect the character and openness of the Green Belt and makes reference to a new country park associated with a strategic site allocation but will not itself result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

## Appendix C Screening Matrices

Does the policy need to be screened into the Appropriate Assessment?

- No

### Policy SO7.7: Amendments to the Green Belt

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy identifies which of the allocated sites require changes to green belt boundary to enable them, but will not itself result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

### Policy SO7.8: Protecting, Conserving and Enhancing the Strategic Green Space Network

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy safeguards the strategic green space network and will not result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

## Policy SO8.1: Low and Zero Carbon Energy and Heat Production

Likely activities (operation) to result as a consequence of the proposal:

- Renewable energy and heat infrastructure

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

## Policy SO8.2: Achieving Net Zero Carbon Development

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy sets emissions standards for new development and will not result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

## Policy SO8.3: Sustainable Design

Likely activities (operation) to result as a consequence of the proposal:

- Renewable energy and heat infrastructure (within major developments)

## Appendix C Screening Matrices

- Green and blue infrastructure (within major developments)

Type of adverse effect that could arise from likely activities:

- Recreation pressure

Does the policy need to be screened into the Appropriate Assessment?

- No – improving green links could in theory increase trips to European sites from residential development, but the contribution of this within major developments is likely to be minor compared with the presence of new homes themselves (assessed in relation to Policy SO3.1).

### Policy SO8.4: Managing Flood Risk

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy sets principles for minimising the flood risk of new developments and will not itself result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

This policy (SO8.4) requires major developments to incorporate sustainable drainage systems and flood protection, which could contribute to mitigation for impacts on water quantity / quality.

## Policy SO8.5: Avoiding Air, Water, Soil, Noise and Light Pollution

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy sets principles for minimising or mitigating pollution in major developments but will not result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

This policy (SO8.5) requires major development to demonstrate how air, water, soil, noise and light pollution will be avoided or mitigated. It provides protection for Air Quality Management Areas, and states that development will not be permitted without confirmation that existing or improved sewage/wastewater treatment facilities can accommodate new development. This policy will contribute to mitigation for air pollution and changes to water quantity/quality (and non-physical disturbance, which has been screened out).

## Policy SO8.6: Brownfield and Despoiled Land and Under-Utilised Buildings

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy sets principles for prioritising under-utilised land and buildings for new developments and will not result in new development / activities.

## Appendix C Screening Matrices

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

### Policy SO8.7: Safeguarding Mineral Reserves

Likely activities (operation) to result as a consequence of the proposal:

- None – this policy safeguards sites for minerals extraction identified in the Staffordshire Minerals Local Plan and will not itself result in new development / activities.

Type of adverse effect that could arise from likely activities:

- None

Does the policy need to be screened into the Appropriate Assessment?

- No

## Policies that could have a certain type of impact

### Policy SO2.3: Provision of Active Leisure and Sport

Likely activities (operation) to result as a consequence of the proposal:

- Sport facilities (within major development)
- Changes in water abstraction / discharge

## Appendix C Screening Matrices

- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Air pollution
- Changes in water quantity or quality

Does the policy need to be screened into the Appropriate Assessment?

- Yes – sports facilities have the potential to act as a trip generator and, depending on the type of facility (e.g. swimming pool), could result in changes to water abstraction / discharge. This policy relates to sports facilities as part of major development; therefore the principle of development and its location will be assessed separately (e.g. allocated sites and Policy SO3.1) but with reference to this policy where relevant.

### Policy SO3.1: Provision for New Homes

(Minimum of 6,016 dwellings at five strategic housing allocations, 39 non-strategic allocations, and within rural areas where certain criteria are met.)

Likely activities (operation) to result as a consequence of the proposal:

- Residential development
- Changes in water abstraction / discharge
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Recreational pressure / urban effects
- Changes in water quality/quantity
- Air pollution
- Loss of habitat

## Appendix C Screening Matrices

Does the policy need to be screened into the Appropriate Assessment?

- Yes – Cannock Chase SAC and Cannock Extension Canal SAC are sensitive to changes in water quantity / quantity, air pollution and loss of habitat; Cannock Chase SAC is also sensitive to recreation pressure / urban effects (fires), and West Midland Mosses SAC is sensitive to air pollution.
- Residential development without 15km of Cannock Chase SAC (the whole Plan area) could result in an increase in recreation pressure / urban effects. No allocated sites are within a European site but non-allocated development in rural areas could in theory result in physical loss of habitat. There is insufficient information (traffic data and information on water abstraction / discharge) to rule out effects due to changes in water quality / quantity and air pollution, at the screening stage.

### Policy SO3.4: Gypsies, Travellers and Travelling Show People

(11 additional plots.)

Likely activities (operation) to result as a consequence of the proposal:

- Residential development
- Changes in water abstraction / discharge
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Recreational pressure
- Changes in water quality/quantity
- Air pollution

Does the policy need to be screened into the Appropriate Assessment?

## Appendix C Screening Matrices

- Yes – although the quantum of development is small, the residential development permitted by this policy will combine with the residential development permitted by Policy SO3.1.

### Policy SO4.2: Provision for New Employment Uses

(50 ha, with 22 ha provided on 10 allocated (safeguarded) sites.)

Likely activities (operation) to result as a consequence of the proposal:

- Employment development and supporting facilities (e.g. childcare)
- Changes in water abstraction / discharge
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Changes in water quality/quantity
- Air pollution
- Loss of habitat

Does the policy need to be screened into the Appropriate Assessment?

- Yes – there is insufficient data (traffic data and information on water abstraction / discharge) to rule out effects due to changes in water quality / quantity and air pollution, at the screening stage. Employment development could in theory take place within a European site although this policy directs Use Class E development to town centres.

### Policy SO4.3: Sustainable Tourism and the Rural Economy

Likely activities (operation) to result as a consequence of the proposal:

- Employment development

## Appendix C Screening Matrices

- Tourist accommodation
- Visitor and recreational facilities
- Blue infrastructure
- Changes in water abstraction / discharge
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Recreation pressure
- Changes in water quality/quantity
- Air pollution
- Loss of habitat

Does the policy need to be screened into the Appropriate Assessment?

- Yes – tourism and employment development could improve access to European sites and increase visitor pressure (Cannock Chase SAC is sensitive to urban effects: fire) and could in theory take place within a European site. Is not possible to quantify changes in water quality / quantity or vehicle traffic that could occur as a result of this policy.

### **Policy SO6.5: Cannock Town Centre Redevelopment Areas**

(Five allocated sites in Cannock)

Likely activities (operation) to result as a consequence of the proposal:

- Mixed use development
- Changes in water abstraction / discharge
- Changes in vehicle traffic

## Appendix C Screening Matrices

Type of adverse effect that could arise from likely activities:

- Recreational pressure
- Changes in water quality/quantity
- Air pollution

Does the policy need to be screened into the Appropriate Assessment?

- Yes – sites will result in the same types of development as the residential and employment site allocations (although there is no possibility that development will occur within a European site, with this policy).

### Policy SO6.6: Rugeley Town Centre Redevelopment Areas

(Three allocated sites in Rugeley.)

Likely activities (operation) to result as a consequence of the proposal:

- Mixed use development
- Changes in water abstraction / discharge
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Recreational pressure
- Changes in water quality/quantity
- Air pollution

Does the policy need to be screened into the Appropriate Assessment?

- Yes – as for Policy SO6.5.

## Policy SO6.7: Hednesford Town Centre Redevelopment Areas

(Two allocated sites in Hednesford.)

Likely activities (operation) to result as a consequence of the proposal:

- Mixed use development
- Changes in water abstraction / discharge
- Changes in vehicle traffic

Type of adverse effect that could arise from likely activities:

- Recreational pressure
- Changes in water quality/quantity
- Air pollution

Does the policy need to be screened into the Appropriate Assessment?

- Yes – as for Policy SO6.5.

## Policy SO8.8: Managing Waste

Likely activities (operation) to result as a consequence of the proposal:

- Waste management facilities
- Changes in vehicle traffic
- Changes in water abstraction / discharge

Type of adverse effect that could arise from likely activities:

- Air pollution

## Appendix C Screening Matrices

- Loss of habitat
- Changes in water quantity / quality

Does the policy need to be screened into the Appropriate Assessment?

- Yes – this policy could increase HDV traffic on roads within the district. There is current insufficient information (potential development type/location, traffic data) to rule out air pollution or water quantity/quality effects. As this policy is not associated with allocated sites, development could in theory take place within a European site.

The second part of the appendix lists allocated sites and considers which sites need to be screened in for different types of impact.

### Type of impact: **Air pollution**

#### Screening criteria ('Allocated site could have a significant effect if...')

- Development increases traffic flows by at least 1,000 AADT or 200 HDVs AADT (alone or in combination) on the following roads:
  - A513 (where it passes Cannock Chase SAC)
  - A460 (where it passes Cannock Chase SAC)
  - A5 (where it passes Cannock Extension Canal SAC)
  - A518 (where it passes West Midland Mosses SAC / Midland Meres & Mosses (Phase 1) Ramsar)

## Allocated sites meeting screening criteria (sites to be

considered in Appropriate Assessment)

- There is currently insufficient data to quantify changes in traffic flows that could arise from development associated with the Local Plan, but traffic is more likely on some roads from allocated sites in specific areas:
  - A513 – runs along northern edge of district so **allocated sites in and around Rugeley** are more likely to contribute to traffic on this road (e.g. commuting to/from Stafford)
  - A460 – runs between Cannock and Rugeley, so **all allocated sites** could contribute traffic to this road
  - A5 – runs roughly parallel to the M6 in the southern part of the district and likely to only be used by the allocated sites adjacent to the road: **HE54, E10, and SH3**.
  - A518 – lies out of the district and does not have a direct route to it. Likely that **no allocated sites** will have a significant effect alone although **all allocated sites** could contribute to an effect in combination.

## Type of impact: **Recreation pressure**

### Screening criteria ('Allocated site could have a significant effect if...')

- Residential development within 15km of Cannock Chase SAC

## Allocated sites meeting screening criteria (sites to be

considered in Appropriate Assessment)

- **All allocated sites**

## Type of impact: **Change in water quantity/ quality**

### Screening criteria ('Allocated site could have a significant effect if...')

- Development is close to / upstream of watercourse that passes through Cannock Chase SAC or close to Cannock Extension Canal SAC
- Development discharges to watercourses in / groundwater under the Cannock Chase SAC and exceeds treatment capacity of wastewater treatment works
- Development extracts water from watercourses in / groundwater under Cannock Chase SAC

### Allocated sites meeting screening criteria (sites to be

considered in Appropriate Assessment)

- There are no site allocations close to / upstream of watercourses passing through Cannock Chase SAC, or uphill from / adjacent to Cannock Extension Canal SAC.
- The location of water abstraction, treatment and discharge, and the capacity of treatment works, is currently unknown; although MAGIC [See [reference 63](#)] shows drinking water abstraction close to Cannock Chase SAC (near the junction of Marquis Drive and the A460) and a Principal aquifer beneath the northern and western parts of Cannock district, including parts of Cannock Chase SAC. This impact is more likely to be relevant to **allocated sites north of Hednesford**.

## Type of impact: **Loss of habitat**

### Screening criteria ('Allocated site could have a significant effect if...')

- Development is within Cannock Chase SAC or Cannock Extension Canal SAC

### Allocated sites meeting screening criteria (sites to be considered in Appropriate Assessment)

- No site allocations are within or immediately adjacent to a European site.

## **Appendix D**

### **Allocated sites considered in the HRA**

Residential, employment and mixed-use site allocations, based on Local Plan Preferred Options draft V8 received 19 February 2021.

**Table D.1: Strategic housing allocations (set out in Policy SO3.1)**

Site Reference	ELAA/SHLAA Reference	Location	Capacity (homes)
SH1	C116a, C489, C352	South Lichfield Road, Cannock	875
SH2	C279, C84	East of Wimblebury Road	410
SH3	C121	Land to rear of Longford House, Watling Street Cannock	45
SH4	R32	Land east of The Meadows and land to the north of Armitage Lane Brereton	33
SH5	N33	Land to the north of no.2 Hednesford Road, Norton Canes	175

**Table D.2: Residential sites with planning permission (Table B in the Local Plan)**

Site Reference	ELAA/SHLAA Reference	Location	Capacity (homes)
H16	C113 (g)	Land west of Pye Green Road, Hednesford Cannock (Land Northern end of C113(c))	80
H17	C113 (f)	Land west of Pye Green Road, Hednesford Cannock (Adj...Pye Green Road. Land South of and Surrounding C113((e))	78

**Appendix D** Allocated sites considered in the HRA

Site Reference	ELAA/SHLAA Reference	Location	Capacity (homes)
H18	C63	Land adjacent and to the rear of 419-435, Cannock Road, Hednesford	25
H19	C422(b)Pt2	Blocks C-D, Beecroft Court, Beecroft Road, Cannock	10
H20	R127	Rugeley Power Station, Rugeley	1,000
H21	R16	Land between Wharf Road and Hardie Avenue, Rugeley WS15 1NX	179
M6	R143	Rugeley Market Hall and Bus Station, Rugeley	50
M7	R144	Land at Wellington Drive, Rugeley	30
H24	R145	Market Street garages, Rugeley (incorporating BT telephone exchange)	28
H25	R23	Main Road, Brereton (between Cedar Tree Hotel and Library)	27
H26	R194	Pear Tree Youth Centre, Hislop Road, Rugeley, WS15 1LS	18
H27	R139	Heron Court, Heron Street, Rugeley	10

**Table D.3: Sites suitable for residential development (Table C in the Local Plan)**

Site Reference	ELAA/SHLAA Reference	Location	Capacity (homes)
SH2	C84	Land to the East of Wimblebury Road, Heath Hayes	150

**Appendix D** Allocated sites considered in the HRA

Site Reference	ELAA/SHLAA Reference	Location	Capacity (homes)
H29	C488	Land at 521, Pye Green Road, Hednesford, Cannock	80
H30	C64	Land at Rawnsley Road, Hazel Slade	60
M1	C504	Multi Storey Car Park, Market Hall and Retail Units, Church Street, Cannock	40
H32 and M5	C511	Avon Road/Hallcourt Lane, Cannock	40
M3	C506	Beecroft Road Car Park, Cannock	35
H34	C81	Land at Chapel Street, Heath Hayes	30
H35	C177	Land at Girton Road/Spring Street, Cannock	28
H36	C509	Park Road Offices, Cannock	25
H37	C510	Police Station Car Park, Cannock	25
H38	C86	Land at Walsall Road, Avon Road, Hunter Road, Hallcourt Lane, Cannock	24
H39	C152	26 - 28 Wolverhampton Road, Cannock	21
H40	C507	Danilo Road Car Park, Cannock	20
M4	C508	Backcrofts Car Park, Cannock	20
M2	C505	Park Road Bus Station, Cannock	15
H43	C521	243, Hill Street, Hednesford, Cannock	13
H44	C237	268 Bradbury Lane, Hednesford	13

**Appendix D** Allocated sites considered in the HRA

Site Reference	ELAA/SHLAA Reference	Location	Capacity (homes)
H45	C498	23 Walsall Road, Cannock, WS11 5BU	12
H46	C17	St. Chad's Courtyard, Cannock Road, Chadsmoor	10
H47	R43(a) and R43 (b)	Former Kodak Processing Site and Transport Depot and former Milk Depot, Redbrook Lane Industrial Estate, Brereton	93
H48	R9	Aelfgar School, Taylors Lane, Rugeley	85
H49	R18 and R18a	Land at The Mossley, off Armitage Road	40
H50	R25	Nursery Fields, St Michaels Road, Brereton	38
H51	R208	Castle Inn, 141, Main Road, Brereton	27
H52	R22	Gregory Works, Armitage Road, Brereton	23
H53	R189	Land off Lichfield Road, Rugeley	20
H54	NE1	Land off Norton Green lane, Norton Canes	20

**Table D.4: Existing employment sites (set out in Policy SO4.2)**

Site Reference	ELAA/SHLAA Reference	Location	Capacity (homes)
E1	CE67	Land at Lakeside Boulevard, Cannock	n/a

**Appendix D** Allocated sites considered in the HRA

Site Reference	ELAA/SHLAA Reference	Location	Capacity (homes)
E2	CE68	110 Walsall Road, Cannock, WS11 0JB	n/a
E3	CE63	Former Rumer Hill Industrial Estate, Cannock	n/a
E4	RE3	Former Power Station off A51(adjacent to Towers Business Park), Rugeley	n/a
H20	RE24	Rugeley Power Station, Rugeley	n/a
E6	RE29	Land at the Academy Early Years Childcare (Former Talbot Public House), Main Road, Brereton	n/a
E7	RE7	Power Station Road (Land South of Rugeley Eastern By-pass), Rugeley	n/a
E8	RE8	Power Station Road, Rugeley	n/a
E10	NE5	Turf Field, Watling Street	n/a
E12	CE19	Site between A5 and M6 Toll, Norton Canes	n/a

**Table D.5: Mixed use sites (set out in policies SO6.5, SO6.6 & SO6.7)**

Site Reference	ELAA/SHLAA Reference	Location	Capacity (homes)
M1	C504/CE73	Church Street, Cannock	Unknown
M2	C505	Bus station, Cannock	Unknown

**Appendix D** Allocated sites considered in the HRA

Site Reference	ELAA/SHLAA Reference	Location	Capacity (homes)
M3	C506/CE40	Beecroft Road Car Park, Cannock	Unknown
M4	C508	Backcrofts Car Park, Cannock	Unknown
H32 and M5	C511/part of CE46	Avon Road / Hallcourt Lane, Cannock	Unknown
M6	R143/RE15	Rugeley Market Hall / bus station and surrounding area	Unknown
M7	R144 / RE16	Land at Wellington Drive, Rugeley	Unknown
M8	RE20	Leathermill Lane / Trent and Mersey Canal Corridor, Rugeley	Unknown
M9	C129	Corner of Uxbridge Street and Market Street, Hednesford	Unknown
M10	CE74	Former co-op supermarket building, Anglesey Street, Hednesford	Unknown

## References

- 1 The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London
- 2 The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), TSO (The Stationery Office), London
- 3 The exception to this would be where 'imperative reasons of overriding public interest' can be demonstrated; see paragraph 1.17
- 4 The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated. (Source: UK Government Planning Practice Guidance)
- 5 <https://www.gov.uk/guidance/appropriate-assessment>
- 6 Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive')
- 7 Directive 2009/147/EC of 30 November 2009 on the conservation of wild birds (the 'Birds Directive')
- 8 The network of protected areas identified by the EU:  
[https://ec.europa.eu/environment/nature/natura2000/index\\_en.htm](https://ec.europa.eu/environment/nature/natura2000/index_en.htm)
- 9 <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>
- 10 <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>
- 11 NPPF para 176, available from <https://www.gov.uk/guidance/national-planning-policy-framework>
- 12 The HRA Handbook, Section A3. David Tyldesley & Associates, a subscription based online guidance document:  
<https://www.dtapublications.co.uk/handbook/European>

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- 13** UK Government Planning Practice Guidance, available from <https://www.gov.uk/guidance/appropriate-assessment>
- 14** The HRA Handbook. David Tyldesley & Associates, a subscription based online guidance document: <https://www.dtapublications.co.uk/handbook/>
- 15** Conservation objectives for SACs and SPAs are published by Natural England
- 16** In line with the CJEU judgment in Case C-323/17 People Over Wind v Coillte Teoranta, mitigation must only be taken into consideration at this stage and not during Stage 1: HRA Screening
- 17** In addition to SAC and SPA citations and conservation objectives, key information sources for understanding factors contributing to the integrity of the sites include (where available) conservation objectives supplementary advice and Site Improvement Plans prepared by Natural England:  
<http://publications.naturalengland.org.uk/category/5458594975711232>
- 18** Adapted from the HRA Handbook, David Tyldesley & Associates:  
<https://www.dtapublications.co.uk/handbook/>
- 19** CHAPMAN, C. & TYLDESLEY, D. 2016. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions. Natural England Commissioned Reports, Number 207
- 20** Obtained from the Natural England website ([www.naturalengland.org.uk](http://www.naturalengland.org.uk))
- 21** Obtained from Natural England website:  
<http://publications.naturalengland.org.uk/category/6490068894089216>
- 22** SI No. 2017/2012
- 23** ECJ Case C-127/02 "Waddenzee" Jan 2004
- 24** Assessment of plans and projects significantly affecting European sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission Environment DG, November 2001
- 25** Ibidem

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- 26** Supplementary Advice for Conservation Objectives: Cannock Chase SAC  
<http://publications.naturalengland.org.uk/publication/6687924741472256>
- 27** Supplementary Advice for Conservation Objectives: Pasturefields Salt Marsh SAC  
<http://publications.naturalengland.org.uk/publication/6292877810335744>
- 28** Air Pollution Information System, Site Relevant Critical Loads  
<http://www.apis.ac.uk/srcl>
- 29** SSSI unit condition <https://magic.defra.gov.uk/MagicMap.aspx>
- 30** Highways Agency, 2019, Design Manual for Roads and Bridges, LA105 Air Quality: <https://www.standardsforhighways.co.uk/dmrb/>
- 31** Institute for Air Quality Management and Assessment, 2020, Guide to the assessment of air quality impacts on designated nature conservation sites
- 32** Natural England, 2018, Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations
- 33** Footprint Ecology, 2013, Cannock Chase SAC Visitor Impacts Mitigation Report: <https://www.footprint-ecology.co.uk/reports/Underhill-Day%20and%20Liley%20-%202012%20-%20Cannock%20Chase%20SAC%20visitor%20impacts%20mitigation%20repor.pdf>
- 34** Footprint Ecology, 2013, Cannock Chase SAC Visitor Survey  
<https://www.lichfielddc.gov.uk/downloads/file/634/cannock-chase-special-area-of-conservation-visitor-survey>
- 35** [https://www.cannockchasedc.gov.uk/sites/default/files/cannock\\_chase\\_sac\\_updated\\_guidance\\_2016.pdf](https://www.cannockchasedc.gov.uk/sites/default/files/cannock_chase_sac_updated_guidance_2016.pdf)
- 36** Footprint Ecology, 2017, Cannock Chase SAC – Planning Evidence Base Review  
[https://www.cannockchasedc.gov.uk/sites/default/files/cannock\\_chase\\_sac\\_evidence\\_base\\_report\\_september\\_2017\\_0.pdf](https://www.cannockchasedc.gov.uk/sites/default/files/cannock_chase_sac_evidence_base_report_september_2017_0.pdf)
- 37** Footprint Ecology, 2018, Evidence base to inform a car park strategy and a site users strategy for Cannock Chase

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- [https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/Further%20Information%20and%20Evidence/Habitats%20Regulation%20Assessment/Evidence%20base%20for%20strategies%20Final\\_Can\\_Chase\\_SAC.pdf](https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/Further%20Information%20and%20Evidence/Habitats%20Regulation%20Assessment/Evidence%20base%20for%20strategies%20Final_Can_Chase_SAC.pdf)
- 38** Footprint Ecology, 2019, Cannock Chase visitor survey 2018  
[https://www.cannockchasedc.gov.uk/sites/default/files/cannock\\_chase\\_visitor\\_survey\\_2018\\_part\\_1\\_0.pdf](https://www.cannockchasedc.gov.uk/sites/default/files/cannock_chase_visitor_survey_2018_part_1_0.pdf)
- 39** Footprint Ecology, 2020, Public Consultation responses relating to the Cannock Chase SAC SAMMM detailed implementation plans: car parking, site user infrastructure, education and engagement  
[https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Cannock%20Chase%20SAC%20Partnership/Public%20Consultation%20Responses%20Report%20%202020\\_0.pdf](https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Cannock%20Chase%20SAC%20Partnership/Public%20Consultation%20Responses%20Report%20%202020_0.pdf)
- 40** Footprint Ecology 2020 Cannock Chase SAC SAMMM Detailed Implementation Plan: site user infrastructure, education and engagement  
<https://www.lichfielddc.gov.uk/downloads/file/1524/cannock-chase-sac-strategic-access-management-monitoring-measures-detailed-implementation-plan-dip-site-user-infrastructure-education-and-engagement>
- 41** Footprint Ecology, 2020, Cannock Chase SAC SAMMM Detailed Implementation Plan: car parking  
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- 42** Information from: <https://uwwtd.eu/United-Kingdom/treatment-plant/ukenmisttp000048/2014>
- 43** <https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Evidence%20Base%20Documents/Southern%20Staffordshire%20Water%20Cycle%20Study%20%28Feb%202020%29.pdf>
- 44** Paragraph 5.15 below explains what is needed
- 45** Natural England & Cannock Chase SAC Partnership, 2020, Cannock Chase SAC planning applications 'Frequently Asked Questions'

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- 47** Develop Contributions and Housing Choices Supplementary Planning Document (2015)  
[https://www.cannockchasedc.gov.uk/sites/default/files/developer\\_contributions\\_spd\\_adopted\\_july\\_2015.pdf](https://www.cannockchasedc.gov.uk/sites/default/files/developer_contributions_spd_adopted_july_2015.pdf)
- 48** Footprint Ecology, 2017, Cannock Chase SAC Planning Evidence Review  
[https://www.cannockchasedc.gov.uk/sites/default/files/cannock\\_chase\\_sac\\_evidence\\_base\\_report\\_september\\_2017\\_0.pdf](https://www.cannockchasedc.gov.uk/sites/default/files/cannock_chase_sac_evidence_base_report_september_2017_0.pdf)
- 49** Rugeley Power Station is large site on the border of Cannock Chase district and Lichfield district; a joint SPD has been prepared for the site and its HRA concluded that the in Policy CP13 of the adopted Local Plan would be sufficient mitigation
- 50** Aquifer designation maps and source protection zones  
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