



South Staffordshire Council

# Habitat Regulations Assessment (HRA) Review

October 2018



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# **The Local Plan Review**

## **Issues and Options**

### **Habitat Regulations Appraisal (HRA) Review**

**October 2018**



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# Introduction and Background

## Purpose of this Report

- 1.1 This Habitats Regulations Assessment (HRA) report has been produced to accompany the publication of the South Staffordshire Local Plan Review Issues and Options Document. The report aims to identify and collect information in relation to designated European Nature Conservation sites which could be affected by proposals promoted through the Local Plan Review process. The report also provides an initial overview of the potential effects on European sites of the policy and growth options contained within the Local Plan Review Document to gain an early insight as to which aspects of the plan proposals are likely to be the focus of future plan screening and Appropriate Assessment (where this is considered necessary).
- 1.2 Future iterations of the HRA will continue the process of policy evaluation to examine what effect the preferred and submitted development strategy and policy choices may have on European sites both alone and in combination with the plans and programmes of other agencies and authorities.

## The Local Plan Review

- 1.3 The Local Plan Review will produce a hybrid plan containing both broad policies for steering and shaping strategic development within the district, defining areas where development should be limited and identifying the development requirements to meet the needs of local communities. Once adopted this plan will replace the 2012 Core Strategy and 2018 Site Allocations Document and will cover the plan period 2018-2037.
- 1.4 The Issues and Options plan offers a range of policy and growth choices which will be the subject of a forthcoming public consultation to inform the development of a preferred strategy for submission and examination. The plan at present contains five potential growth options a range of suggested growth locations and policy options relating to thirty three separate topic areas.
- 1.5 The Local Plan Review Issues and Option Document was published in October 2018 and will be the subject of a period of public consultation during the period 8th October – 30<sup>th</sup> November 2018. This HRA report will also be subject to public consultation during this period.

## Habitats Regulation Assessment

- 1.6 The EC Habitats Directive (as applied in England through the Conservation of Habitats and Species Regulations 2017 ‘the Habitat Regulations’) states that any plan (or project), which is not directly connected with or necessary to the management of a European site, but would be likely to have a significant effect on such a site, either individually or in combination with other plan or projects, shall be subject to an ‘appropriate assessment’ of its implications for the European site in view of the site’s conservation objective. The plan-making body shall agree to the plan only having ascertained that it will not adversely affect the integrity of the site concerned.

- 1.7 **The Local Plan review is not a plan directly connected with or necessary to the conservation management of a European Site and therefore a Habitats Regulation Assessment will be required.**
- 1.8 European sites include Special Areas of Conservation (SAC), candidate SACs (cSAC) and Special Protection Areas (SPA). HRA is also required, as a matter of UK Government policy<sup>1</sup>, for potential SPAs (pSPA), possible SACs (pSAC) and proposed and listed Wetlands of International Importance (Ramsar sites) for the purposes of considering plans and projects which may affect them.

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<sup>1</sup> Paragraph 176 of National Planning Policy Framework (July 2018)



## 2. Methodology

- 2.1 A Habitats Regulation Assessment is a sequential process comprising the following four stages:

**Stage 1 – Screening:** an appraisal of the proposals and policies within the plan to identify any potential effects of the plan or project on a European site. This appraisal will need to consider potential effects of the plan alone and also in combination with other plans or projects.

**Stage 2 – Appropriate Assessment:** Any effects which cannot be screened out as part of stage 1 will need to be the subject of an Appropriate Assessment. If adverse impacts are anticipated, potential mitigation measures can be considered and assessed at this stage.

**Stage 3 – Alternative Solutions:** Where significant effects cannot be readily mitigated, alternative solutions such as different locations should be examined and assessed.

**Stage 4 – Compensatory Measures:** Where no alternative solutions can be identified (and where there is imperative reasons of overriding public interest), consideration of compensatory measures to offset negative impacts.

- 2.2 This HRA report is focussed on identifying which European sites should be included within the assessment and providing an overview of the policies and proposals within the Issues and Option document. A full Stage 1 screening assessment will accompany the publication of the Local Plan Review Preferred Options document. Should it be determined that Local Plan proposals are likely to have a significant effect on one or more European sites an 'Appropriate Assessment' of the effects of the plan in relation to the affected site or sites will be undertaken. The requirement to undertake further stages of the HRA process will be dependent on the findings of the Appropriate Assessment and the effectiveness of any mitigation measures which may be introduced to address any potential effects.

### Determining which European Sites are Included in the HRA

- 2.3 The first section of the report outlines information with respect to the European Sites which are to be included within the HRA process. This information relates to the qualifying features of each site, the conservation objectives<sup>2</sup> and an indication of the issues<sup>3</sup> which may be impacting on the integrity of each site. This section also includes a high level assessment to indicate if the issues identified as affecting the sites may be susceptible to influence as a consequence of proposals and policies typically identified within a local development plan document.
- 2.4 In determining which European sites to include within the report consideration was given to the sites identified in the Habitats Regulations Assessment<sup>4</sup> undertaken in relation to the

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<sup>2</sup> Information taken from Natural England Access to Evidence 'Conservation Objectives for European Site' <http://publications.naturalengland.org.uk/category/5134123047845888>

<sup>3</sup> Information taken from Natural England Access to Evidence 'Site Improvements Plans: West Midlands' <http://publications.naturalengland.org.uk/category/4879822899642368>

<sup>4</sup> Site Allocations Development Plan Document HRA Update (August 2018)

recently adopted Site Allocation Document and was checked on 14<sup>th</sup> September 2018<sup>5</sup>. Further guidance on this matter will be sought from Natural England and the list will be refined accordingly. The list of European sites included in previous HRA reports is as follows:

### Sites situated within the District boundary

2.5 There is a single site located within the District: **Mottey Meadows SAC**

### Sites outside the District where impacts from plan policies and proposals could potentially arise

2.6 The adopted Core Strategy (2012) and Site Allocations Document (2018) used a 20km<sup>6</sup> zone of search to identify European sites for screening assessment. It is proposed to retain this threshold to support the precautionary principle approach with regards to potential impacts arising from development plan policies and proposals outside the boundaries of the district:

- **Cannock Chase SAC** – Located directly adjacent to the north-eastern boundary of South Staffordshire.
- **Cannock Extension Canal SAC** – Located approximately 750m east of South Staffordshire, near Wyrley Common, Cannock.
- **Fens Pool SAC** – Located approximately 2.5km east of South Staffordshire, in Pensnett, Dudley.
- **Midland Meres and Mosses Ramsar Site (Phase 2 site)** – Located approximately 4.2 km north of South Staffordshire, near Newport, Stafford.
- **Pasturefields, Saltmarsh SAC** – Located approximately 6.1 km north-east of South Staffordshire, near Hixon, Stafford; and
- **West Midland Mosses SAC** – Located approximately 10 km north-east of South Staffordshire, near Stowe-by-Chartley, Stafford.

### Sites hydrologically connected where there could be a potential downstream effect

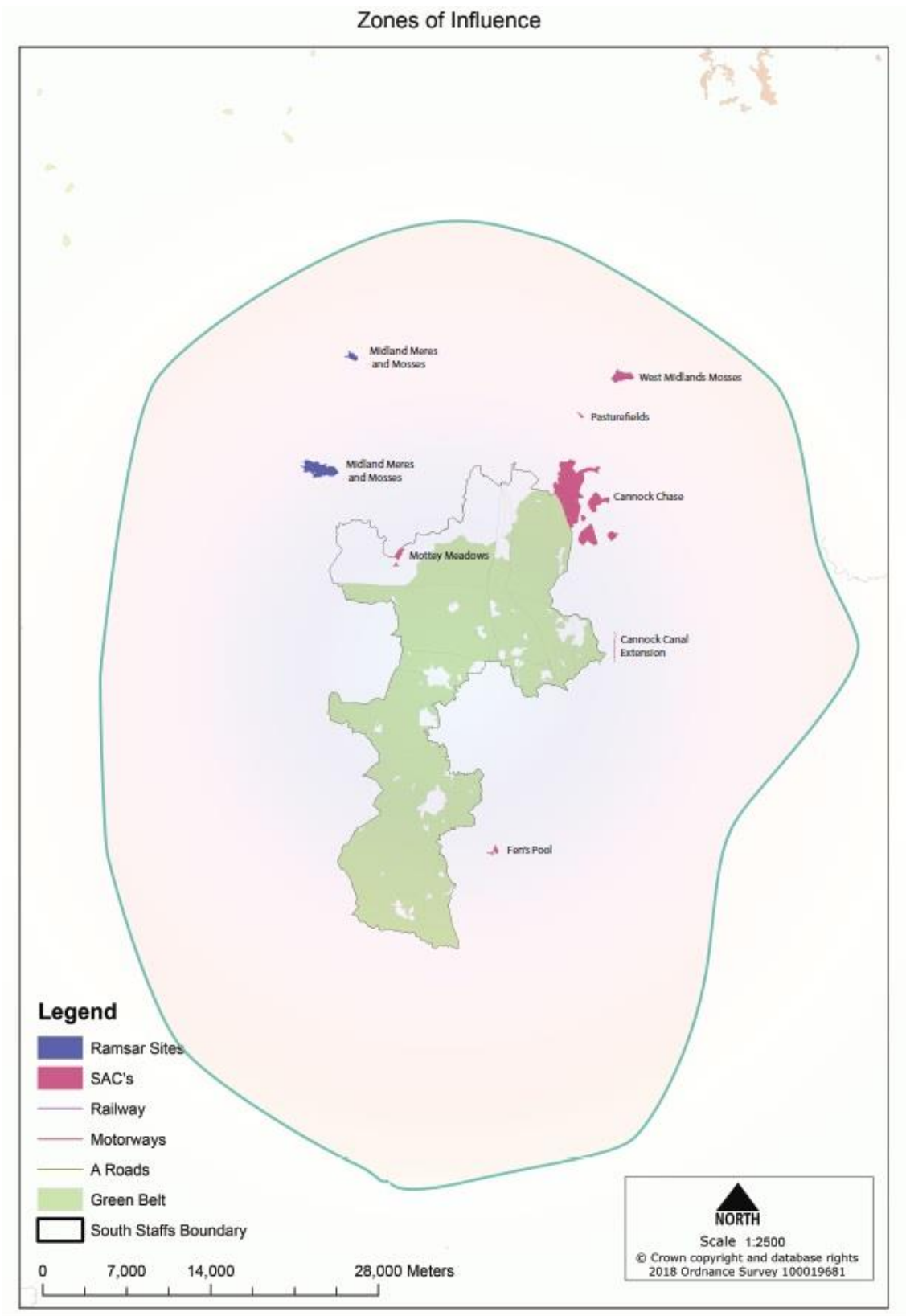
2.7 South Staffordshire is situated within the River Trent Catchment and therefore the following European sites are included:

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<sup>5</sup> The MAGIC website <http://www.magic.gov.uk/> was checked on 14/09/2018 to confirm the number of European sites.

<sup>6</sup> The Environment Agency Integrated Pollution Control (IPC) and Pollution Prevention and Control (PPC) guidance notes that a proposal to construct a coal or oil fired power station should consider impacts on European sites up to 15 km away (Page 4 of the Habitats Directive – Work Instruction: Appendix 7 Technical and Procedural Issues Specific to IPC and PPC produced by the Environment Agency in July 2004). The most recent England Leisure Visits report states that people will travel up to 17.3 km to a countryside destination (England Leisure Visits: Summary of the 2005 Leisure Visits Survey, Natural England, 2005). These distances have been rounded up to 20 km on a precautionary basis to ensure that all sites that may be impacted by a new development are considered as part of the HRA process.

- Severn Estuary SPA, SAC and Ramsar sites
- Humber Estuary SPA, SAC and Ramsar sites



## **Review of the Issues and Options Local Plan Review Document**

- 2.8 The second part of this HRA report comprises a review of the growth and policy options contained within the Issues and Options Local Plan Review document. The purpose of this assessment is to identify those broad policy areas and strategies where potential effects on a designated European site could arise. Policies and proposals which would not directly lead to development or are solely concerned with environmental protection measures are generally not considered to promote a likely significant effect.

## **Obtaining Information on Other Projects and Plans**

- 2.9 The Habitats Regulations require that potential plan effects are considered both in terms of the plan alone and also in combination with the projects and plans of other authorities and agencies. It is proposed to undertake this stage at a later iteration of the HRA process once the policy and strategy choices contained in the issues and options document have been refined to identify a preferred strategy and policy direction. It is considered at this present time that there is insufficient certainty in terms of the levels and locations of future development proposals to enable a meaningful assessment of the in combination impacts of the Local Plan Review with other projects and plans.

## 3. The European Sites

- 3.1 This section includes information about the European sites identified in para 2.4 above and includes details on location, qualifying features, condition, recognised pressures and a high level indication of whether these pressures may be the subject of influence arising from matters which are the subject of development plan documents.

<b>Mottey Meadows SAC</b> Located within District Qualifying Features: H6150 Lowland Hay Meadows ( <i>Alopecurus Pretensis Sanguisorha Officinalis</i> ) Condition: Majority Favourable		
Conservation Objectives	Main Pressures Affecting the Site	Potential Plan Influence
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 and restoring: The extent and distribution of the qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats, and The supporting processes on which qualifying natural habitats rely.	Water pollution – notably nutrient enrichment associated with agriculture Hydrological changes – the site is ground water dependent Water abstraction – trickle irrigation associated with agriculture Change in land management – requirement for hay cut and grazing.	The SAC is located within the District and could be potentially susceptible to pressures related to land changes, water pollution, hydrological changes and water abstraction.  Issues related to land development and ground water levels may be subject to influence through the local plan. Therefore the policies and proposals in the Local Plan review will need to be screened for potential effects in relation to the conservation objectives identified for this site.
<b>Cannock Chase SAC</b> Located directly adjacent to the north-eastern boundary of South Staffordshire. Qualifying Features: H4010: Northern Atlantic wet heaths with <i>Erica tetralix</i> . Wet heathland with cross-leaved heath. H4030 European dry heaths Condition: Majority Unfavourable (Recovering)		
Conservation Objectives	Main Pressures Affecting the Site	Potential Plan Influence
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	Undergrazing Drainage Hydrological changes Disease Air Pollution: Impact of atmospheric nitrogen disposition Wildlife/arson Invasive species The site description identifies that the site is subject to high visitor pressure and has in place	Owing to the close proximity of the site to the boundary of the District potential impacts include effect on drainage and hydrology. Roads passing near the SAC also pass through the District, increase vehicle movements associated with additional development could have air pollution impacts. The level of visitors has been identified as having an impact

<p>qualifying natural habitats, and, The supporting processes on which the qualifying natural habitats rely.</p>	<p>access management measures to mitigate the negative effects of predicted future increases in recreational usage of the SAC.</p>	<p>on the integrity of the SAC. New development which generates more visits and visitors to the SAC could have a significant effect upon the SAC requiring additional mitigation measures.</p> <p>Issues have been identified which may be subject to influence through the local plan and the policies and proposals in the Local Plan review will need to be screened for potential effects in relation to the conservation objectives identified for this site.</p>
<p><b>Cannock Extension Canal SAC</b>                  Located approximately 750m east of South Staffordshire, near Wyrley Common, Cannock.                  Qualifying Features: S1831 Luronium Natans; Floating water-plantain                  Condition: Majority Unfavourable (Recovering)</p>		
<p><b>Conservation Objectives</b></p>	<p><b>Main Pressures Affecting the Site</b></p>	<p><b>Potential Plan Influence</b></p>
<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:                  The extent and distribution of the habitats of qualifying species;                  The structure and function of the habitats of qualifying species;                  The supporting processes on which the habitats of qualifying species rely;                  The populations of qualifying species, and,                  The distribution of qualifying species within the site.</p>	<p>Water Pollution - particularly associated with heavy rainfall events                  Over grazing – related to presence of Canada Geese                  Invasive Species                  Air Pollution – nitrogen exceeds critical load, could be affected by major roads, industrial estate and farming activities.</p>	<p>Whilst situated outside the District, major roads (principally the A5) passing near the SAC also pass through South Staffordshire. A Nitrogen Action Plan does not yet exist to determine sources of the pollution and identify potential mitigation measures. Development within South Staffordshire could potentially increase traffic flows along the A5 and further assessment of this potential effect could be necessary.</p> <p>Issues have been identified which may be subject to influence through the local plan and the policies and proposals in the Local Plan review will need to be screened for potential effects in relation to the conservation objectives identified for this site.</p>

<b>Fens Pool SAC</b> Located approximately 2.5km east of South Staffordshire, in Pensnett, Dudley. Qualifying Features: S1166. Triturus cristatus; Great crested newt Condition: Favourable		
Conservation Objectives	Main Pressures Affecting the Site	Potential Plan Influence
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 the qualifying species; The structure and function of the habitats of the qualifying species; The supporting processes on which the habitats of the qualifying species rely; The populations of qualifying species, and, The distribution of qualifying species within the site.	Overgrazing – localised impact reducing available of invertebrate food prey Inappropriate scrub control – localised issue regarding scrub management and vegetation encroachment Disease – localised issue relating to newt infection Water Pollution – localised issue relating to off road vehicles Habitat Fragmentation – urban location resulting in poor wider connectivity.	The pressures affecting the site are primarily localised in nature. The site is outside of the District and it is considered that the policies and proposals within the South Staffordshire Local Plan Review are unlikely to have a significant effect on this site.
<b>Midland Meres and Mosses Ramsar Site</b> Located approximately 4.2 km north of South Staffordshire, near Newport, Stafford. Qualifying Features: Ramsar criterion 1 (site comprises a diverse range of habitats) and 2 (site supports a number of rare plant species and rare invertebrates).		
Conservation Objectives	Main Pressures Affecting the Site	Potential Plan Influence
	Eutrophication Invasion of non-native plant species Pollution – pesticides/agricultural runoff	The nature of the identified pressures affecting the site appear to be localised including pollution run-offs associated with agricultural practices and the invasion of non-native plant species. The site is outside of the District and it is considered that the policies and proposals within the South Staffordshire Local Plan Review are unlikely to have a significant effect on this site.

<b>Pasturefields Salt Marsh</b> Located approximately 6.1 km north-east of South Staffordshire, near Hixon, Stafford; Qualifying Features: Triturus Cristatus; Great Crested Newt Condition: Unfavourable (No Change)		
<b>Conservation Objectives</b>	<b>Main Pressures Affecting the Site</b>	<b>Potential Plan Influence</b>
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 the qualifying species; The structure and function of the habitats of the qualifying species; The supporting processes on which the habitats of the qualifying species rely; The populations of qualifying species, and, The distribution of qualifying species within the site.	No issues identified affecting this site.	The site is situated 6.1km from South Staffordshire District. No potential issues have been identified as placing pressure on the conservation objectives of the site. Given the distance and lack of identified issues it is considered that the policies and proposals within the South Staffordshire Local Plan Review are unlikely to have a significant effect on this site.
<b>West Midlands Mosses SAC</b> Located approximately 10 km north-east of South Staffordshire, near Stowe-by-Chartley, Stafford. Qualifying Feature: H3160. Natural dystrophic lakes and ponds; Acid peat-stained lakes and ponds H7140. Transition mires and quaking bogs; Very wet mires often identified by an unstable 'quaking' surface. Condition: Unfavourable (Recovering)		
<b>Conservation Objectives</b>	<b>Main Pressures Affecting the Site</b>	<b>Potential Plan Influence</b>
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	Water Pollution – localised problem relating to activities within small catchments causing nutrient enrichment. Hydrological change – SAC vulnerable to groundwater abstraction and artificial flooding. Air Pollution - impact of atmospheric nitrogen deposition. Inappropriate scrub control – impact associated with a number of potential factors including nutrient enrichment.	The site is situated 10 kilometres distant from the boundaries of the District. No indication of the pollution source of atmospheric nitrogen deposition.  Potential for effects arising as a consequence of plan policies and proposals are slight however should it be identified that the source of air pollution is related to traffic movements implementing the precautionary principle would



habitats rely.	Game management and pheasant rearing – localised issue contributing to nutrient enrichment impacts. Forestry and woodland management – localised issue relating to woodland management practices. Habitat fragmentation – issue related to scale and isolation of the fragmentary habitats.	suggest that the Local Plan review will need to be screened for potential effects in relation to the conservation objectives identified for this site.
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**Humber Estuary SAC**

Located over 20km distance from South Staffordshire

Qualifying Features: H1110. Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks, H1130. Estuaries, H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats, H1150. Coastal lagoons, H1310. Salicornia and other annuals colonising mud and sand, H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) H2120. Shifting dunes along the shoreline with *Ammophila aneraia* (“white dunes”); Shifting dunes with marram, H2130. Fixed dunes with herbaceous vegetation (“grey dunes”); Dune grassland H2160. Dunes with *Hippophae rhamnoides*; Dunes with sea-buckthorn, S1099. *Lampetra fluviatilis*; River lamprey, S1364. *Halichoerus grypus*, S1364. *Halichoerus grypus*; Grey seal.

Condition: Majority Unfavourable (Recovering)

Conservation Objectives	Main Pressures Affecting the Site	Potential Plan Influence
<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <p>The extent and distribution of qualifying natural habitats and habitats of qualifying species;</p> <p>The structure and function (including typical species) of qualifying natural habitats;</p> <p>The structure and function of the habitats of qualifying species;</p> <p>The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;</p> <p>The populations of qualifying species, and;</p> <p>The distribution of qualifying species within the site.</p>	<p>Water pollution</p> <p>Coastal squeeze</p> <p>Changes in species distribution</p> <p>Undergrazing</p> <p>Invasive species</p> <p>Natural changes to site condition</p> <p>Public access/disturbance</p> <p>Fisheries: fish stocking</p> <p>Fisheries: Commercial marine and estuarine</p> <p>Direct land take from development</p> <p>Air pollution: impact of atmospheric nitrogen deposition</p> <p>Shooting/scaring</p> <p>Direct impact from third party</p> <p>Inappropriate scrub control</p>	<p>Assessment undertaken during the preparation of the South Staffordshire Core Strategy and recently adopted Site Allocations Document concluded from advice provided by the Environment Agency that no licenses covering South Staffordshire were found to have likely significant effects on the Humber Estuary SAC, SPA and Ramsar.</p> <p>Potential for effects arising as a consequence of plan policies and proposals are slight however based on the precautionary principle it is considered that the Local Plan review will need to be screened for potential effects in relation to the conservation objectives identified for this site.</p> <p>An update on the advice from</p>

		the Environment Agency should be sought once the plan has been refined to indicate the levels and potential locations of future growth.
<p><b>Severn Estuary SPA SAC and Ramsar Site</b>                  Located over 20km Distance from South Staffordshire                  Qualifying Features: 1130 Estuaries; 1140 Mudflats and Sandflats not covered by seawater at low tide; Atlantic salt meadows; 1170 Sandbanks which are slightly covered by sea water all the time; 1170 Reefs; 1095 Sea lamprey; 1099 River lamprey; 1103 Twaite shad.                  Condition: Majority Favourable</p>		
Conservation Objectives	Main Pressures Affecting the Site	Potential Plan Influence
<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:</p> <p>The extent and distribution of qualifying natural habitats and habitats of qualifying species                  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 habitats of qualifying species rely;                  The populations of qualifying species, and;                  The distribution of qualifying species within the site.</p>	<p>Public Access/Disturbance – impact on bird species sensitive to disturbance.                  Physical Modification – water course modification influencing water flow, sediments and migration.                  Impacts of development – primarily in relation to proposals within and adjacent to the estuary.                  Coastal Squeeze – impact of sea level rises.                  Change in Land Management – affecting use of grassland and salt marsh.                  Changes in species distribution – resulting from climate change etc.                  Water Pollution – uncertainty in relation to water quality due to diffuse and direct pollution.                  Air Pollution – nitrogen deposition exceeds site relevant critical loads.                  Marine Consents and Permits – minerals and waste.                  Fisheries – recreational and commercial.                  Invasive Species – reports of marine invasive non-native species.                  Marine Litter – uncertain impacts of man-made litter.                  Marine Pollution Incidents</p>	<p>Assessment undertaken during the preparation of the South Staffordshire Core Strategy and recently adopted Site Allocations Document concluded from advice provided by the Environment Agency that no licenses covering South Staffordshire were found to have likely significant effects on the Severn Estuary SAC, SPA and Ramsar.</p> <p>Potential for effects arising as a consequence of plan policies and proposals are slight however based on the precautionary principle it is considered that the Local Plan review will need to be screened for potential effects in relation to the conservation objectives identified for this site.</p> <p>An update on the advice from the Environment Agency should be sought once the plan has been refined to indicate the levels and potential locations of future growth.</p>

## 4. HRA Review of Growth and Policy Options

- 4.1 The recently adopted Site Allocations Document (September 2018) included a policy commitment to undertake an early plan review to respond to the increasing need for development within South Staffordshire and neighbouring authorities. The new Local Plan will establish development requirements for residential (including Gypsy, Traveller and Travelling Showpeople accommodation), retail and employment uses up until 2037.
- 4.2 The Issues and Options consultation document represents the first stage in the process of updating the Local Plan for South Staffordshire. This initial stage in the plan preparation process comprises a range of strategic development options and policy choices which will be subject to refinement following public consultation and the collections of additional supporting evidence to produce a preferred approach which will be the subject of further consultation.
- 4.3 This appraisal of the Issues and Options document seeks to provide an early indication of those aspects of the plan which it is considered have the potential to affect designated European sites. This review will also highlight those aspects of the plan where it is considered such impacts are less likely to occur. Future iterations of the HRA will be undertaken to accompany further stages of the Plan as it progresses towards formal submission and adoption. These subsequent HRA appraisals will provide a full screening assessment of the likely impacts of the Local Plan and will also include an in-combination assessment to ensure that the potential impacts of the plan are considered alongside the policies and proposals of the other authorities and agencies.

Strategy Choice/ Policy Theme	Policy Description	Potential factors for consideration during HRA screening
Housing level of growth policy options	Five potential growth options ranging from 5130 dwellings to 25130 dwellings during the plan period 2018-2037.	This strategy choice relates to potential future levels of housing growth and does not seek to address potential future locations for growth. Additional detail on potential growth locations is covered in the section relating to Spatial Distribution Policy options (See below).  <b>Advice on the potential effects upon the Humber and Severn Trent SAC/SPA/Ramsar of the indicative growth levels should be sought to verify that the existing advice which was provided in the context of the previous local plan remains valid.</b>
Safeguarded land/ reserve housing sites	Consideration of this issue arises from the commitment within national planning policy to identify Green Belt boundaries which will endure beyond the plan period.	This policy option is seeking to determine if, and at what level, the Council should introduce a commitment to providing safeguarded sites for housing. The policy option neither identifies levels or locations of such provision. Screening and possible Appropriate Assessment of this policy may be required once greater clarity has been provided in terms of a commitment to a safeguarding requirement.

Strategy Choice/ Policy Theme	Policy Description	Potential factors for consideration during HRA screening
Gypsy Traveller and Travelling Showpeople level of growth	A potential shortfall of 67 residential pitches and 3 travelling showpeople plots has been identified. Two policy options have been identified; one would seek to meet this need within the boundaries of the authority the other is a suggestion that this need could be exported to adjoining authorities.	<p>This strategy choice relates to potential future levels of Gypsy and Traveller pitch/site provision and does not seek to address potential future locations for growth. Additional detail on potential growth locations is still to be identified.</p> <p><b>Advice on the potential effects upon the Humber and Severn Trent SAC/SPA/Ramsar on the indicative growth levels should be undertaken to verify that the existing advice which was provided in the context of the previous local plan remains valid.</b></p>
Employment level of growth options	Assessment of employment land supply suggests an overprovision locally but an undersupply within the wider sub regional economic area. Policy options range from deallocating poor quality sites through to allocating additional sites to meet cross boundary requirements.	<p>This strategy choice relates to potential future levels of employment growth and does not seek to address potential future locations for growth. Additional detail on potential growth locations is covered in the section relating to Spatial Distribution Policy options (See below).</p> <p><b>Advice on the potential effects upon the Humber and Severn Trent SAC/SPA/Ramsar on the indicative growth levels should be undertaken to verify that the existing advice which was provided in the context of the previous local plan remains valid.</b></p>
Strategic Rail Freight Interchange	A planning application has been prepared and submitted for a Rail Freight Interchange facility at Four Ashes	<p>This proposal is a Nationally Significant Infrastructure Project and will therefore be assessed as part of the Development Consent Order (DCO) regime.</p> <p>Direct effects of this proposal will be determined as part of the DCO. Should the project be approved consideration will need to be given to potential in-combination effects of this proposal with the policies and proposals in the Local Plan Review.</p>
Retail – level of growth	No clear policy options proposed at present for the future level of additional town centre retail development.	<p>Potential future retail requirements are at present uncertain. The policy option neither identifies levels or locations of such provision.</p> <p>Screening and possible Appropriate Assessment of this policy may be required once greater clarity has been provided in terms of a</p>

Strategy Choice/ Policy Theme	Policy Description	Potential factors for consideration during HRA screening
		commitment to additional retail development.
Housing densities	Potential policy requirement to support a minimum density standard of 35 dwellings.	This policy would not lead directly to development but would establish criteria against which development proposals would be assessed.
Settlement hierarchy	This policy seeks to outline a revised settlement hierarchy which will be used to inform the scale and distribution of future growth.	The settlement hierarchy will help to establish a framework to assist the decision making process with respect to the future distribution of growth requirements. Additional detail on potential growth locations is covered in the section relating to Spatial Distribution Policy options (See below).
Spatial Distribution Option A – F	<p>Six potential spatial options have been identified in the Issues and Options document as follows:</p> <p>A – Growth at districts larger and better connected villages.</p> <p>B – Dispersed across all settlements with services.</p> <p>C – Small scale urban extensions</p> <p>D – Neighbouring fringe extensions</p> <p>E – New settlements</p> <p>F – Minimum housing densities</p>	<p>The potential and magnitude of impacts will to an extent be determined by the scale and location of the preferred growth and spatial strategy.</p> <p>Options A, B (and E depending on selection) would potentially focus more growth in the north of the District. This could potentially locate significant additional areas of growth in closer proximity to Cannock Chase SAC, Cannock Canal SAC and Mossey Meadows SAC. Options C, D (and E depending on selection) offer the potential for a greater level of growth to be focussed to the south and conurbation fringe areas, this could offer the possibility of selecting growth locations physically more distant from a number of the European sites.</p> <p>The following highlight the potential impacts associated with additional levels of growth occurring within the district:</p> <p>Cannock Chase SAC – To address the impacts associated with visitor numbers a 15km Zone of Influence (ZOI) surrounding the SAC and associated mitigation measures has been established. It is likely that most options for future growth will involve development occurring within this zone. A review of the evidence base supporting the existing approach is currently being undertaken to establish an up to date evidence base including ZOI. Additional housing growth within the zone is likely to increase recreational pressures on the SAC and</p>

Strategy Choice/ Policy Theme	Policy Description	Potential factors for consideration during HRA screening
		<p>therefore an Appropriate Assessment of effects will be required. Impacts related to air quality have also been identified as impacting the SAC and the potential influence of additional traffic generation associated with development will also need to be assessed.</p> <p>In-combination effects from other plans or projects that would lead to an increase in visitor recreation pressures impacting upon the SAC would also need to be considered in any screening and Appropriate Assessment. At this stage (prior to a review of the SAC's evidence base) it is considered that this would relate to other development plan documents proposing residential growth within the 15km zone of influence of the SAC. In-combination effects from other plans or projects that would lead to an increase in traffic movements across the Cannock Chase SAC would also need to be considered in any screening and Appropriate Assessment. It is considered that this would relate to other development plan documents proposing residential or employment development growth which is likely to materially increase the levels of traffic on roads running across the SAC, although there is currently insufficient information available to determine the extent of these movements.</p> <p>Mottey Meadows SAC – This SAC is situated within the district and therefore could be susceptible to potential impacts associated with additional development either directly through changing land use or indirectly should a connection between development and site sensitivities such as impact on groundwater levels or water pollution be established. There are no public rights of way associated with the site and therefore impacts associated with recreational pressures are not considered likely. Additional housing growth will require further screening assessment and may require an Appropriate Assessment of effects.</p> <p>Cannock Extension Canal – There is potential for effects associated with increased levels of traffic particularly on the A5 corridor which is in close</p>

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		<p>proximity to the SAC. Following the Wealden Decision which addressed the approach to assessing the cumulative impact of increased traffic loads, additional levels of development could increase traffic loads on the A5 corridor and will need to be considered.</p> <p>In-combination effects from other plans or projects that would lead to an increase in traffic movements along the A5 corridor would also need to be considered in any screening assessment and Appropriate Assessment. It is considered that this would relate to other development plan documents proposing residential or employment development which is likely to materially increase road traffic along the A5 corridor, although there is currently insufficient information available to determine the extent of these movements.</p> <p>West Midlands Mosses SAC – The site is known to be susceptible to air pollution and water environment impacts which could arise from additional pressures associated with development. The HRA reports produced for the Core Strategy (2012) and Site Allocations Document (2018) concluded that there were no clear linkages between this site and development in the district. Given that the sites are susceptible to potential impacts which could arise from additional development and in order to align with the precautionary principle approach it is proposed that consideration should be given to the potential cumulative and in-combination impacts of new development. Additional housing growth will require further screening assessment and may require an Appropriate Assessment of effects.</p> <p>Humber and Severn Trent SAC/SPA/Ramsar – An update on the situation with respect to water catchment impacts will be required for these sites.</p>
Employment locations for growth policy options	Four potential employment growth options have been promoted: Option A – Focus on	The potential and magnitude of impacts will to an extent be determined by the scale and location of the preferred growth and spatial strategy.



Strategy Choice/ Policy Theme	Policy Description	Potential factors for consideration during HRA screening
	<p>the existing four freestanding strategic employment sites.                      Option B- New freestanding employment sites                      Option C – focus on larger villages                      Option D – Deliver as part of mixed use schemes.</p>	<p>Cannock Chase SAC –Impacts related to air quality have been identified as impacting the SAC and the potential influence of additional traffic generation associated with development will need to be assessed. Additional employment growth will require further screening assessment and may require an Appropriate Assessment of effects.</p> <p>In-combination effects from other plans or projects that would lead to an increase in traffic movements across the Cannock Chase SAC would also need to be considered in any screening and Appropriate Assessment. It is considered that this would relate to other development plan documents proposing residential or employment development growth which is likely to materially increase the levels of traffic on roads running across the SAC, although there is currently insufficient information available to determine the extent of these movements</p> <p>Mottey Meadows SAC – This SAC is situated within the district and would be susceptible from direct impacts resulting from land take and could also be impacted should new development have a detrimental impact on water levels and quality. Additional employment growth will require further screening assessment and may require an Appropriate Assessment of effects.</p> <p>Cannock Extension Canal – There is potential for effects associated with increased levels of traffic particularly on the A5 which is in close proximity to the SAC. Additional employment growth will require further screening assessment and may require an Appropriate Assessment of effects.</p> <p>In-combination effects from other plans or projects that would lead to an increase in traffic movements along the A5 corridor would also need to be considered in any screening assessment and Appropriate Assessment. It is considered that this would relate to other development plan documents proposing residential or employment development which is likely to materially increase road traffic along the</p>



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		<p>A5 corridor, although there is currently insufficient information available to determine the extent of these movements</p> <p>West Midlands Mosses SAC – The site is known to be susceptible to air pollution and water environment impacts which could arise from additional pressures arising from development. The HRA reports produced for the Core Strategy (2012) and Site Allocations Document (2018) concluded that there were no clear linkages between this site and development in the district. Given that the sites are susceptible to potential impacts which could arise from additional development and in order to align with the precautionary principle approach it is proposed that consideration should be given to the potential cumulative and in-combination impacts of new development. Additional employment growth will require further screening assessment and may require an Appropriate Assessment of effects.</p> <p>Humber and Severn Trent SAC/SPA/Ramsar – An update on the situation with respect to water catchment impacts will be required for these sites.</p>
Housing mix	Range of policy options to better align housing mix with needs.	This policy would not directly lead to development but would establish criteria against which development proposals would be assessed.
Specialist housing	Range of policy options which are seeking to increase the supply of specialist housing.	This policy would not directly lead to development but would establish criteria against which development proposals would be assessed.
Affordable housing percentage requirements policy options	Range of options suggestion potential policy approaches to determining the scale and flexibility of affordable housing provision.	This policy would not directly lead to development but would establish criteria against which development proposals would be assessed.
Affordable housing tenure split policy options	Options which suggesting a range of potential tenure split options including a district wide approach or a site specific	This policy would not directly lead to development but would establish criteria against which development proposals would be assessed.

Strategy Choice/ Policy Theme	Policy Description	Potential factors for consideration during HRA screening
	requirement.	
Affordable Housing – boosting supply policy options	Options for increasing the supply of development which aim to boost the supply affordable house.	The potential and magnitude of impacts will to be determined by the scale and location of the additional growth. In terms of potential impacts see comments for Spatial distribution options A- F above.
Affordable housing – rural exception sites	Options for increasing the supply of development which aim to boost the supply of affordable housing in rural areas.	The potential and magnitude of impacts will be determined by the scale and location of the additional growth. In terms of potential impacts see comments for Spatial distribution options A- F above.
Entry level exception sites	Options for increasing the supply of development which aim to boost the supply of affordable house.	The potential and magnitude of impacts will be determined by the scale and location of the additional growth. In terms of potential impacts see comments for Spatial distribution options A- F above.
Self and custom house building	Policy options to introduce a mechanism to meet the requirements for self and custom building.	The potential and magnitude of impacts will be determined by the scale and location of the additional growth. In terms of potential impacts see comments for Spatial distribution options A- F above.
Gypsy, Travellers & Travelling Showpeople	Suggested policy approaches for addressing the gypsy, traveller and travelling Showpeople need during the plan period. A number of options could result in new site development.	The potential and magnitude of impacts will be determined by the scale and location of the additional growth. In terms of potential impacts see comments for Spatial distribution options A- F above.
Design and residential amenity	Range of policy options to promote high quality design.	This policy would not directly lead to development but would establish criteria against which development proposals would be assessed.
Public and residential parking policy options	Policy options to improve the provision of parking in sustainable locations and associated with new development proposals.	This policy could result in the identification of sites for additional parking provision. Potential impacts would be dependent on location of new parking provision and relationship to European sites.
Space about dwellings	Policy options to establish standards for space about dwellings	This policy would not directly lead to development but would establish criteria against which development proposals would be

Strategy Choice/ Policy Theme	Policy Description	Potential factors for consideration during HRA screening
		assessed.
Internal space	Policy options to establish internal space standards for dwellings	This policy would not directly lead to development but would establish criteria against which development proposals would be assessed.
Health and wellbeing	Policy options seeking to promote positive health outcomes through measures such as design and green infrastructure.	This policy would not directly lead to development but would establish criteria against which development proposals would be assessed.
Leisure Facilities	Policy options to improve the quantity, quality and accessibility of leisure facilities.	This policy could result in the identification of sites for additional leisure facilities. Potential impacts would be dependent on location of facilities and relationship to European sites.
Children’s play and youth development	Policy options to improve the provision of play and youth development facilities associated with new development proposals.	This policy could result in the identification of sites for additional play facilities. Potential impacts would be dependent on location of new facilities relationship to European sites.
Employment sites	Policy options in relation to the approach to existing employment sites ranging from protection to redevelopment and replacement.	This policy could result in the identification of sites for additional employment land provision. Potential impacts would be dependent on location of new sites and relationship to European sites.
Inclusive growth	Policy options to increase education and training opportunities associated with new development.	This policy would not directly lead to development but would establish criteria against which development proposals would be assessed.
Rural employment and tourism	Policy options which aim to promote the development of employment opportunities in rural areas and within the tourism sector.	This policy could result in the identification of sites for additional employment facilities. Potential impacts would be dependent on location of new development and relationship to European sites.
Village centres and retail policy	Policy options to address the retail requirements of the District including the possibility of new	This policy could result in the identification of sites for additional retail facilities. Potential impacts would be dependent on location of new facilities and relationship to European sites.

Strategy Choice/ Policy Theme	Policy Description	Potential factors for consideration during HRA screening
	provision within larger villages or at strategic sites.	
Protecting community services and facilities	Policy options which examine the potential approach towards securing existing services and facilities.	This policy would not directly lead to development but would establish criteria against which development proposals would be assessed.
Wolverhampton Half Penny Green Airport	Policy approaches to address the treatment of future development at Half Penny Green Airport	This policy could result in additional growth at the airport. Potential impacts would be dependent on nature of the new development proposed.
Infrastructure Policy Options	Policy options setting out the potential approaches to funding infrastructure provision.	This policy would be related to the funding of infrastructure associated with new development and could potentially promote additional development. Potential impacts would be dependent on location of new infrastructure facilities and relationship to European sites.
Public Transport and highway network	Policy options aimed at supporting sustainable transport choices.	This policy would not directly lead to development but would establish criteria against which development proposals would be assessed.
Electronic Communications	Policy approach to supporting the network of electronic communications	This policy could result in the identification of new sites to enhance the network of electronic communications. Potential impacts would be dependent on location of new facilities and relationship to European sites.
Green Belt	Policy support for National Planning Policy Framework approach to Green Belt designation.	This policy would not directly lead to development but would establish criteria against which development proposals would be assessed.
Open countryside	Policy options for development proposals in open countryside outside development boundaries.	This policy would not directly lead to development but would establish criteria against which development proposals would be assessed.
Landscape character	Policy options regarding the consideration of landscape character when assessing planning proposals.	This policy is intended to protect the natural environment.
Natural environment	Policy measures to support the enhancement of the	This policy is intended to protect the natural environment.

Strategy Choice/ Policy Theme	Policy Description	Potential factors for consideration during HRA screening
	natural environment with a particular focus on designated sites.	
Cannock Chase AONB and Special Area of Conservation	Policy measures to protect the AONB and Special Area of Conservation.	This policy is intended to protect the natural environment.
Open space, green infrastructure and landscaping	Policy approaches towards enhancing the provision of open space and green infrastructure.	This policy is intended to protect the natural environment.
Adapting to a changing environment	Policy measures which are focussed on improving energy efficiency and the design of new buildings and existing buildings and supporting measures to increase the production of renewable energy.	This policy would not directly lead to development but would establish criteria against which development proposals would be assessed.
Flooding and pollution	Policy measures to minimise the risks associated with flooding and pollution.	This policy would not directly lead to development but would establish criteria against which development proposals would be assessed.
Historic environment	Policy measure to conserve and enhance heritage assets.	This policy is intended to protect the historic environment.

## 5. Conclusion

5.1 This report represents an initial stage in support of producing a Habitats Regulation Assessment to accompany the production the Local Plan Review Development Plan. The report detailed a number of European Sites which it considered have a potential relationship with the plan area. This list has been refined to take account of the known pressures influencing these sites and the degree to which such pressures could be influenced by policies and proposals within the emerging Local Plan. It was concluded that a number of the European sites could be discounted from future consideration and that attention should be focussed on the following sites:

- Motte Meadows SAC
- Cannock Chase SAC
- Cannock Extension Canal SAC
- West Midlands Mosses SAC
- Humber and Severn Estuaries SAC, SPA & Ramsar.

5.2 A number of the strategy options and policy themes within the Issues and Options are concerned with identifying future development options, it is recommended that these aspects of the plan should be the prime focus of further screening assessment and potentially an Appropriate Assessment of likely effects as the plan proceeds through the various stages of plan preparation.





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