



Cannock Chase Local Plan

Habitats Regulations

Assessment

Addendum to Regulation 19 HRA

Cannock Chase District Council

Final report

Prepared by LUC

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Land Use Consultants Limited

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Chapter 1

Introduction

1.1 This addendum supplements the Habitats Regulations Assessment (HRA) report published for consultation alongside the Cannock Chase Pre-Submission (Regulation 19) Local Plan.

1.2 The addendum provides an update on some parts of the HRA in response to traffic modelling and air quality assessment work undertaken in relation to Special Areas of Conservation (SACs) identified for further assessment in the HRA. The updates also reflect comments received from Natural England during the Regulation 19 consultation (see **Appendix A**). The implications of these changes are set out in this addendum.

Previous HRA work

1.3 The HRA of the Preferred Options Local Plan (March 2021) identified the potential for four types of effect (physical habitat loss, air pollution from vehicle traffic, recreation pressure and urban effects, and water quantity/quality) with potentially significant effects at the Screening stage. Appropriate Assessment was undertaken in relation to these effects. Through the Appropriate Assessment it was not possible to rule out adverse effects on integrity in relation to:

- Air pollution from vehicles at Cannock Chase SAC, Cannock Extension Canal SAC and West Midland Mosses SAC, with further information required in relation to traffic data.
- Recreation pressure and urban effects at Cannock Chase SAC, with updates required to the mitigation strategy evidence base and related policy wording.

1.4 The HRA for the Pre-Submission (Regulation 19) version of the Local Plan updated the HRA of the Preferred Options Local Plan, considering comments received during the Regulation 18 consultation and changes to the plan due to updates in relation to the plan's evidence base. The HRA and plan were published for consultation between February and March 2024.

1.5 The HRA was not able to rule out the potential for adverse effects on integrity in relation to air pollution from vehicles at Cannock Chase SAC, Cannock Extension Canal SAC, Pasturefields Salt Marsh SAC, and West Midland Mosses SAC and Midlands Meres and Mosses Ramsar Phase 1 site. It was determined that traffic data would be needed to show current traffic flows (AADT for all traffic and for HDVs) and modelled flows at the end of the plan period (with and without Local Plan development) and to identify the affected road network. An assessment of the changes in traffic flow where roads pass within 200m of a European site would also be needed, with potential need for an air quality assessment and ecological assessment.

Changes since Regulation 19 HRA report

1.6 Since the Regulation 19 HRA was published, the following have occurred.

Natural England response to Regulation 19 consultation

1.7 Natural England's comments are appended to this report (**Appendix A**) and the key points of relevance to the HRA are summarised below.

1.8 Natural England agreed with the conclusion of the Habitats Regulation Assessment that for those European sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-

combination, cannot be ruled out due to a lack of evidence. Adverse effects on integrity have not been ruled out in relation to air quality from vehicles at Cannock Chase SAC, Cannock Extension Canal SAC, Pasturefields Salt Marsh SAC, and West Midland Mosses SAC and Midlands Meres and Mosses Ramsar Phase 1 site.

1.9 Natural England also stated that the text of the HRA should acknowledge that there may be effects at other European sites besides Cannock Chase SAC and Cannock Extension Canal SAC. Furthermore, the effects of ammonia relating to the Local Plan should be assessed and this pollutant should be included within the text of the relevant Local Plan policy.

1.10 Natural England agreed with the conclusions of the HRA regarding adverse effects on the integrity of European sites being ruled out relating to physical loss of habitat, recreation pressure and water quantity/quality, due to safeguards provided within Local Plan policies.

Assessment of air quality impacts

1.11 Given the inability to rule out the potential for adverse effects on integrity due to a lack of evidence, Sweco UK Ltd was commissioned by South Staffordshire District Council (SSDC), on behalf of a partnership of local authorities [\[See reference 1\]](#), to undertake a detailed air quality modelling study to inform an 'in-combination' assessment of air quality impacts at relevant European sites. The assessment was based on traffic data also prepared by Sweco UK Ltd for the partnership authorities, which includes the relevant road links within 200m of each European site included in the assessment.

1.12 The changes in air pollution due to the plan were screened with reference to the screening criteria defined in Natural England guidance [\[See reference 2\]](#), whereby changes equivalent to 1% of the critical load/level for the affected habitat/feature require further assessment.

1.13 The European designated sites included in the Air Quality Assessment Report (2024) [\[See reference 3\]](#) comprise:

- Cannock Chase Special Area of Conservation (SAC);
- Pasturefields Salt Marsh SAC;
- Midlands Meres and Mosses Phase 2 Ramsar site (Cop Mere & Oakhanger Moss);
- Cannock Extension Canal SAC; and
- Fens Pools SAC.

1.14 The HRA for the Pre-Submission Local Plan was not able rule out the potential for adverse effects on integrity in relation to air pollution from vehicles on the West Midland Mosses SAC and Midlands Meres and Mosses (Phase 1) Ramsar site which comprise the same parcel of land. However, the decision was made to scope these sites out of the Air Quality Assessment Report. This approach has been taken because, due to the location of the European Sites in question, land use allocations by any of the partnership authorities local plans would only result in significant traffic growth on the A518. All other roads within 200m of the land in question either:

- Provide access to private residences; or
- Are single tracked roads, which do not act as a link between settlements or a route to the provision of services.

1.15 It is considered highly unlikely that the adoption of land use allocations could result in an increase in AADT of 1000 or greater domestic vehicles or 200 or greater HGVs along a single-track road, which does not provide a clear link between two settlements or provide a route linking areas or residential growth to employment or services.

1.16 The only habitat within the West Midlands Mosses SAC and the Midlands Meres and Mosses (Phase 1) Ramsar Site in question which lies within 200m of the A518 is an area of broadleaved deciduous woodland within Parcel 5 of the underlying Chartley Moss SSSI [\[See reference 4\]](#), [\[See reference 5\]](#).

Broadleaved deciduous woodland is not a qualifying feature of the SAC designation, a criterion for its selection as a Ramsar site or a habitat upon which the species (which form its criterion for Ramsar selection) rely.

1.17 In line with Natural England's 2018 guidance on the assessment of road traffic emissions, no further assessment is required of the Chartley Moss land parcel of the West Midlands Mosses SAC and the Midlands Meres and Mosses (Phase 1) Ramsar Site [\[See reference 6\]](#).

1.18 Therefore, no AEoI is predicted in relation to West Midland Mosses SAC and Midlands Meres and Mosses (Phase 1) Ramsar.

1.19 The AQA included for the assessment of Midlands Meres and Mosses Phase 2 Ramsar site. However, following a meeting with Natural England on 25th September 2024, it was confirmed that no further assessment was required in relation to Oakhanger Moss SSSI and therefore the Ramsar site, which overlaps the SSSI. This is due to the AQA demonstrating that air pollution exceedances at the SSSI and corresponding Ramsar site were primarily as a result of national traffic growth outside of the Partnership Authorities, including Cannock Chase. This is due to the proximity of the Ramsar site to the M6. Therefore, air pollution directly resulting from the Partnership Authorities, including Cannock Chase is de minimus compared to national growth. Detail of this is provided within the draft Statement of Comment Ground [\[See reference 7\]](#). Therefore, no AEoI is predicted in relation to the Ramsar site.

1.20 The AQA report does not identify in-combination effects above the 1% screening criterion in relation to any air pollutants for the Pasturefields Salt Marsh SAC. Therefore, no AEoI is predicted in relation to this SAC.

1.21 The HRA for the Pre-Submission Local Plan did not include the consideration of Fens Pools SAC, which is located more than 15km from the boundary of Cannock Chase. However, as this SAC was included in the AQA, consideration of this site is provided in this section. The SAC is designated for great crested newt (GCN), which are not considered sensitive to impacts from air pollution. Furthermore, it has been confirmed by Dudley MBCs Countryside

Services Team that the ponds that GCN use for breeding are located away from the exceedance areas. Detail of this is provided within the draft Statement of Comment Ground [Reference 7]. Therefore, no AEoI is predicted in relation to the SAC.

1.22 The air quality assessment (AQA) identifies that the following European sites are expected to experience in-combination impacts greater than the 1% significance screening criterion for air pollutants considered:

- Cannock Chase SAC in relation to nitrogen deposition, ammonia and acid deposition.
- Cannock Extension Canal SAC in relation to NO_x, nitrogen deposition and ammonia.

1.23 These sites are therefore the subject of further assessment, as set out in this addendum (Chapter 2).

1.24 Detailed information about these European site is provided in **Appendix B**, described with reference to Standard Data Forms for the SPAs and SACs, Information Sheets for Ramsar sites, and Natural England's Site Improvement Plans [See reference 8]. Natural England's conservation objectives [See reference 9] 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. **Appendix B** also sets out the relevant targets relating to air quality (i.e. the ecological characteristic for which there is potential adverse effects on integrity) for the designated species and habitats within Cannock Extension Canal SAC and Cannock Chase SAC. This information has been taken from Natural England's supplementary advice on conservation objectives [See reference 10].

1.25 Chapter 2 of this addendum sets out the Appropriate Assessment of the effects relating to air pollution.

Chapter 2

Appropriate Assessment - Air Pollution

2.1 As stated above in Chapter 1, the HRA was not able to rule out the potential for adverse effects on integrity in relation to air pollution from vehicles at Cannock Chase SAC and Cannock Extension Canal SAC. Further assessment was therefore required to determine the potential for adverse effects on integrity on these European sites. Detail of which is provided in this Chapter. Whilst considering this information, reference should be made to AQA report in conjunction with the HRA Addendum.

2.2 An AQA was undertaken by Sweco in October 2024. This considers the impacts of air pollution on European sites as a result of increased traffic resulting from development to Partnership Authorities Local Plan, which includes Cannock Chase. Traffic data in the AQA predicted Cannock Chase SAC to exceed the 1% screening criterion for in-combination impacts of air pollution at Road Assessment Points (RAP) 1 and 2 along the A513 and A460 and RAP 10 and 11 along the A5 and B4154 in relation to Cannock Chase Extension Canal. Due to this, further assessment was required at the Appropriate Assessment in relation to areas predicted to experience exceedances in order to determine the likely impacts on the integrity of Cannock Chase SAC and Cannock Extension Canal SAC. RAP 3 along Camp Road did not exceed the 1% threshold, however, was considered further in the AQA for completeness due to the RAPs at Cannock Chase SAC exceeding. The same has been applied in this HRA Addendum.

2.3 The Appropriate Assessment was used to assess whether the predicted exceedances brought about by development from the Local Plan would impact the qualifying features of the SACs, that is the presence of dry and wet heathland at Cannock Chase SAC and the presence of floating water plantain *Luronium natans* at Cannock Extension Canal SAC. The site visits involved in the Appropriate Assessment were carried out by LUC Principal Ecologist Marc Choromanski on 13th and 14th November 2024. The results of this are outlined below.

Nitrogen Oxides (NO_x)

Cannock Chase SAC

2.4 At Cannock Chase SAC, the AQA identified 123 out of 9,788 receptor locations to exceed the 1% significance screening criterion for in-combination impacts of NO_x. These receptors were all located at RAP 1 in close proximity to the A513 towards the northern part of the SAC. The results of the receptor locations where the 1% significance screening criterion was exceeded are presented in Table 2.1 below

Table 2.1: Habitat features at Road Assessment Points (RAP)

European Site	Road Assessment Point (RAP) ID	Road	Approximate distance of European site from roadside (m)	Approximate distance within European Site (m) where the 1% screening criterion is exceeded	Critical Level Applied	Habitats present between the roadside and European site where the 1% screening criterion is exceeded	Habitats present within the European Site where the 1% screening criterion is exceeded as identified by the Site visit on 13-14/11/24
Cannock Chase SAC	RAP 1	A513	0	50	30µg/m3	N/A	Mixed woodland

2.5 The AQA noted that even though 123 out of 9,788 receptors exceeded the 1% significance screening criterion, the maximum predicted annual mean NO_x concentration resulting from the Local Plan in-combination with Partnership Authorities is 12.6µg/m³ which is well below the critical level of 30µg/m³ required to protect vegetation and ecosystems as set under the Convention on Long Range Transboundary Air Pollution **[See reference 11]**.

2.6 The AQA did not identify any receptor locations to exceed the 1% significance screening criterion for in-combination impacts of NO_x at RAP 2 and 3 in relation to A460 Rugeley Road and Camp Road and as such no adverse effects on integrity are predicted at these locations within the SAC.

2.7 Based on the findings of the Air Quality Assessment and Appropriate Assessment supported by a site visit undertaken by a suitably qualified ecologist, it can be concluded that no adverse effect on integrity will occur in relation to Cannock Chase SAC from NO_x as a result of proposed development in the Local Plan, either alone or in-combination.

Cannock Extension Canal SAC

2.8 At Cannock Extension Canal, the AQA identified 72 out of 179 receptors to exceed the 1% significance criterion for in-combination impacts of NO_x. These receptors were located between RAP 10 and 11, to the south of the A5, Watling Street and north of the B4154, Lime Lane. The results of the receptor locations where the 1% significance screening criterion was exceeded are presented in Table 2.2 below.

Table 2.2: Habitat features at Road Assessment Points (RAP)

European Site	Road Assessment Point (RAP) ID	Road	Approximate distance of European site from roadside (m)	Approximate distance within European Site (m) where the 1% screening criterion is exceeded*	Critical Level Applied	Habitats present between the roadside and European site where the 1% screening criterion is exceeded	Habitats present within the European Site where the 1% screening criteria is exceeded as identified by the Site visit on 13-14/11/24
Cannock Extension Canal	RAP 10	A5, Watling Street	0	N/A	30 µg/m ³	Man-made waterbody - canal	Man-made waterbody - canal
Cannock Extension Canal	RAP 11	B4154, Lime Lane	15	N/A	30 µg/m ³	Man-made waterbody - canal	Man-made waterbody - canal

*No distance provided by AQA

2.9 The AQA concluded that the maximum predicted annual mean NO_x concentration resulting from the Local Plan at Cannock Extension Canal SAC is 21.8µg/m³ which is below the 30µg/m³ critical level.

2.10 Based on the findings of the Air Quality Assessment and Appropriate Assessment supported by a site visit undertaken by a suitably qualified ecologist, it can be concluded that no adverse effect on integrity will occur in relation to Cannock Extension Canal SAC from NO_x as a result of proposed development in the Local Plan, either alone or in-combination.

Ammonia (NH₃)

Cannock Chase SAC

2.11 At Cannock Chase SAC, the AQA identified 731 out of 9,788 receptors to exceed the 1% significance screening criterion for in-combination impacts of NH₃. These receptors were located at RAP 1, 2 and 3 within areas adjacent to the A513, the A460 Rugeley Road and Camp Road. The results of the receptor locations where the 1% significance screening criterion was exceeded are presented in Table 2.3 below.

Table 2.3: Habitat features at Road Assessment Points (RAP)

European Site	Road Assessment Point (RAP) ID	Road	Approximate distance of European site from roadside (m)	Approximate distance within European Site (m) where the 1% screening criterion is exceeded	Critical Level Applied	Habitats present between the roadside and European site where the 1% screening criterion is exceeded	Habitats present within the European Site where the 1% screening criterion is exceeded as identified by the Site visit on 13-14/11/24
Cannock Chase SAC	RAP 1	A513	0	50	1 µg/m ³	N/A	Mixed woodland
Cannock Chase SAC	RAP 2	A460 Rugeley Road	67	67	1 µg/m ³	Railway line. Waterbodies and Broadleaved Woodland	Coniferous woodland
Cannock Chase SAC	RAP 3*	Camp Road	0	0	1 µg/m ³	Lowland heathland and deciduous woodland	Lowland heath Deciduous woodland

* Due to the small extent of the SAC (<5m) located in areas of exceedances along Camp Road, no site assessment was undertaken. Habitats were confirmed using Magic Maps and aerial imagery instead.

2.12 A site visit was undertaken to identify habitat within areas where the 1% screening criterion was exceeded at RAP 3 in relation to the A513. No dry and wet heathland (which is the qualifying habitat of this SAC) was noted within these areas of exceedances. The habitat instead was dominated by mixed woodland with an understorey of bramble and bracken, which is not identified as a qualifying feature for the SAC. In addition, this area of mixed woodland acted as a physical barrier between the A513 and the area of heathland, which was recorded at a higher altitude, outside of the areas where the 1% screening criterion was exceeded **[See reference 12]**. Therefore, no adverse effects on integrity to the SAC are predicted in relation to NH₃ at this location either side of the A513.

2.13 In relation to RAP 2, the site visit confirmed that the habitats at this location comprised of dominant conifer woodland with a bracken understorey. Heather and bilberry were identified in the understorey, but their growth was suppressed by the canopy above and the habitat itself was not considered to comprise dry or wet heathland. Cannock Chase SAC is designated for its dry and wet heathlands. Therefore, as these habitats are not present, no impacts to the SAC are predicted in relation to NH₃ at locations adjacent to A460 Rugeley Road.

2.14 For RAP 3, due to the small extent of qualifying heathland habitat present within the areas of exceedances of less than 5m no adverse effects on integrity to the SAC are predicted.

2.15 Based on the findings of the Air Quality Assessment and Appropriate Assessment supported by a site visit undertaken by a suitably qualified ecologist, it can be concluded that no adverse effect on integrity will occur in relation to Cannock Chase SAC from NH₃ as a result of proposed development in the Local Plan either alone or in-combination.

Cannock Extension Canal SAC

2.16 At Cannock Extension Canal SAC, the AQA identified 74 out of 179 receptors to exceed the 1% significance screening criterion for in-combination

Chapter 2 Appropriate Assessment - Air Pollution

impacts of NH₃. These receptors were located to the south of the A5, Watling Street and north of the B4154, Lime Lane. The results of the receptor locations where the 1% significance screening criterion was exceeded are presented in Table 2.4 below.

Table 2.4: Habitat features at Road Assessment Points (RAP)

European Site	Road Assessment Point (RAP) ID	Road	Approximate distance of European site from roadside (m)	Approximate distance within European Site (m) where the 1% screening criterion is exceeded*	Critical Level Applied	Habitats present between the roadside and European site where the 1% screening criterion is exceeded	Habitats present within the European Site where the 1% screening criterion is exceeded as identified by the Site visit on 13-14/11/24
Cannock Extension Canal	RAP 10	A5, Watling Street	0	N/A	3 µg/m ³	Man-made waterbody - canal	Man-made waterbody - canal
Cannock Extension Canal	RAP 11	B4154, Lime Lane	15	N/A	3 µg/m ³	Man-made waterbody - canal	Man-made waterbody - canal

***No distance provided by AQA**

2.17 A site visit was undertaken to identify habitat within areas where the 1% screening criterion was exceeded in relation to the A5, Watling Street and the B4154, Lime Lane. The site visit confirmed the presence of a slow-flowing, freshwater canal which would be a suitable habitat for floating water plantain. It was however not possible to confirm the presence of this qualifying species due to poor water visibility and timing of year. Another factor which made confirmation difficult is that floating water plantain can have a submerged phenotype. Clear water and specific surveys undertaken under licence are therefore required to confirm the presence of this species. However, the Canal and River Trust the body responsible for management of the canal have recently confirmed that this species is known to be present within this section of the SAC [\[See reference 13\]](#).

2.18 Floating water plantain is known to grow in a variety of forms and in a range of environmental conditions from oligotrophic to eutrophic waters. This suggests that it is a relatively tolerant plant in terms of water chemistry [\[See reference 14\]](#). There is evidence to suggest that this species can take time to show signs of impacts from increased nutrient levels from factors, such as air pollution, however given the proximity of this SAC which lies adjacent to the A5, it would have been expected that impacts would have been observed. Other HRAs which have assessed the effect of air pollution on floating water plantain have employed a precautionary approach by using a Nitrogen Critical Load which is applicable to oligotrophic waters (low nutrients) [\[See reference 15\]](#). The critical levels applied by the AQA were also highly precautionary. It is however likely that Cannock Extension Canal SAC features eutrophic waters (high nutrients) due to its proximity to agricultural land uses. Therefore, the presence of floating water plantain at this SAC demonstrates that it is a tolerant plant and not likely to be susceptible to changes in water chemistry due to air pollution below the specified critical loads.

2.19 In addition to the tolerance of floating water plantain to changes in water chemistry, the phenotype of this plant at Cannock Extension Canal SAC is predominantly submerged meaning that it is not in direct contact with the air. As a result, it is less sensitive to changes in gases such as NH₃ which are emitted into the air from numerous sources including agriculture and vehicle emissions [\[See reference 16\]](#). Therefore, the predicted exceedance in NH₃ in

proximity to RAP 10 and 11 at Cannock Extension Canal SAC is not likely to directly impact this qualifying species as it is not sensitive to impacts from air pollution.

2.20 Based on the findings of the Air Quality Assessment and Appropriate Assessment supported by a site visit undertaken by a suitably qualified ecologist, it can be concluded that no adverse effect on integrity will occur in relation to Cannock Extension Canal SAC from NH3 as a result of proposed development in the Local Plan, either alone or in-combination.

Nitrogen Deposition

Cannock Chase SAC

2.21 At Cannock Chase SAC, the AQA identified 310 out of 9,788 receptor locations to exceed the 1% significance screening criterion for in combination impacts of nitrogen deposition. These receptors were located exclusively within a 40m band either side of the A513 and the results of these receptor locations where the 1% significance screening criterion was exceeded are presented in Table 2.5 below.

Table 2.5: Habitat features at Road Assessment Points (RAP)

European Site	Road Assessment Point (RAP) ID	Road	Approximate distance of European site from roadside (m)	Approximate distance within European Site (m) where the 1% screening criterion is exceeded	Critical Level Applied	Habitats present between the roadside and European site where the 1% screening criterion is exceeded	Habitats present within the European Site where the 1% screening criterion is exceeded as identified by the Site visit on 13-14/11/24
Cannock Chase SAC	RAP 1	A513	0	50	1 µg/m ³	N/A	Mixed woodland

2.22 The site visit confirmed that the habitat in proximity to RAP 1 is comprised of dominant mixed woodland with an understory of bramble and bracken. Cannock Chase SAC is designated for its dry and wet heathland. Therefore, as these habitats are not present within the areas of exceedance and the mixed woodland acts as a physical barrier to pollutants, as outlined in paragraph 2.8, no adverse effects on integrity to the SAC are predicted at this location either side of the A513.

2.23 The AQA did not identify any receptor locations to exceed the 1% significance screening criterion for in-combination impacts of nitrogen deposition at RAP 2 and 3 in relation to A460 Rugeley Road and Camp Road and as such no adverse effects on integrity are predicted at these locations within the SAC.

2.24 Based on the findings of the Air Quality Assessment and Appropriate Assessment supported by a site visit undertaken by a suitably qualified ecologist, it can be concluded that no adverse effect on integrity will occur in relation to Cannock Chase SAC from nitrogen deposition as a result of proposed development in the Local Plan, either alone or in-combination.

Cannock Extension Canal SAC

2.25 At Cannock Extension Canal SAC, the AQA identified 89 out of 179 receptor locations to exceed the 1% significance screening criterion for in combination impacts of nitrogen deposition. These receptors were located between the south of the A5, Watling Street and 200m beyond where the B4154, Lime Lane intersects the SAC. The results of these receptor locations where the 1% significance screening criterion was exceeded are presented in Table 2.6 below.

Table 2.6: Habitat features at Road Assessment Points (RAP)

European Site	Road Assessment Point (RAP) ID	Road	Approximate distance of European site from roadside (m)	Approximate distance within European Site (m) where the 1% screening criterion is exceeded*	Critical Level Applied	Habitats present between the roadside and European site where the 1% screening criterion is exceeded	Habitats present within the European Site where the 1% screening criterion is exceeded as identified by the Site visit on 13-14/11/24
Cannock Extension Canal	RAP 10	A5, Watling Street	0	N/A	10kg/ha/yr	Man-made waterbody - canal	Man-made waterbody - canal
Cannock Extension Canal	RAP 11	B4154, Lime Lane	15	N/A	10kg/ha/yr	Man-made waterbody - canal	Man-made waterbody - canal

*No distance provided by AQA

2.26 As outlined in paragraph 2.16 despite not being able to confirm during the site visit, Cannock Extension Canal SAC does feature floating water plantain, likely in the submerged phenotype. Under the precautionary approach using a critical load of 10kg N/ha/yr, areas of exceedance could in principle affect the areas which support the qualifying feature of Cannock Extension Canal SAC.

2.27 However, floating water plantain has been recorded in a variety of waters, tolerating a wide range of nutrient levels. The effective critical load is therefore likely to be higher, towards 19.3 kg N/ha/yr [See reference 17]. Therefore, as floating water plantain is more tolerant to changes in water chemistry in relation to air pollution than considered in the AQA, no adverse effects on integrity to the SAC are predicted at this location due to nitrogen deposition. In addition, it is important to note that due to the dynamic nature of the Canal, floating water plantain will only be exposed temporarily to higher fluxes of nitrogen, thus further reducing the likely impact on this species.

2.28 Based on the findings of the Air Quality Assessment and Appropriate Assessment supported by a site visit undertaken by a suitably qualified ecologist, it can be concluded that no adverse effect on integrity will occur in relation to Cannock Canal Extension SAC from nitrogen deposition as a result of proposed development in the Local Plan, either alone or in-combination.

Acid Nitrogen

Cannock Chase SAC

2.29 For acid nitrogen, the AQA identified 127 out of 9,788 receptor locations at Cannock Chase SAC to exceed the 1% significance screening criterion for in-combination impacts. These receptors were located exclusively adjacent to the A513 and the results of these receptor locations where the 1% significance screening criterion was exceeded are presented in Table 2.7 below.

Table 2.7: Habitat features at Road Assessment Points (RAP)

European Site	Road Assessment Point (RAP) ID	Road	Approximate distance of European site from roadside (m)	Approximate distance within European Site (m) where the 1% screening criterion is exceeded	Critical Level Applied	Habitats present between the roadside and European site where the 1% screening criterion is exceeded	Habitats present within the European Site where the 1% screening criteria is exceeded as identified by the Site visit on 13-14/11/24
Cannock Chase SAC	RAP 1	A513	0	50	1 µg/m ³	N/A	Mixed woodland

2.30 The site visit confirmed that the habitat in proximity to RAP 1 is comprised of dominant mixed woodland with an understory of bramble and bracken. Cannock Chase SAC is designated for its dry and wet heathland. Therefore, as these habitats are not present within the areas of exceedance and the mixed woodland acts as a physical barrier to pollutants, as outlined in paragraph 2.8, no adverse effects on integrity to the SAC are predicted in relation to acid deposition at this location adjacent to the A513.

2.31 The AQA did not identify any receptor locations to exceed the 1% significance screening criterion for in-combination impacts of acid deposition at RAP 2 and 3 in relation to A460 Rugeley Road and Camp Road and as such no adverse effects on integrity are predicted at these locations within the SAC.

2.32 Based on the findings of the Air Quality Assessment and Appropriate Assessment supported by a site visit undertaken by a suitably qualified ecologist, it can be concluded that no adverse effect on integrity will occur in relation to Cannock Chase SAC from acid deposition as a result of proposed development in the Local Plan, either alone or in-combination.

Cannock Extension Canal SAC

2.33 The AQA did not assess the impacts of acid deposition at Cannock Extension Canal SAC.

2.34 As mentioned in paragraph 2.16 floating water plantain is generally a tolerant plant, and acidification has not been shown to have any impact on growth [[See reference 18](#)].

2.35 Based on the findings of the Air Quality Assessment and Appropriate Assessment supported by a site visit undertaken by a suitably qualified ecologist, it can be concluded that no adverse effect on integrity will occur in relation to Cannock Extension Canal SAC from acid deposition

as a result of proposed development in the Local Plan, either alone or in-combination.

Summary of Appropriate Assessment – Air Pollution

2.36 The conclusions of the Appropriate Assessment in relation to each pollutant are summarised in Table 2.8 below. For both of the European Sites subject to Appropriate Assessment, the effects of air quality were found to have no adverse effect on (site) integrity (AEoI).

Table 2.8: Summary of Appropriate Assessment in relation to Air Quality

European site	Nitrogen Oxides (NOx)	Ammonia (NH ₃)	Nitrogen Deposition	Acid Nitrogen
Cannock Chase SAC	No AEoI	No AEoI	No AEoI	No AEoI
Cannock Extension Canal SAC	No AEoI	No AEoI	No AEoI	No AEoI

Chapter 3

Conclusions

3.1 The air quality assessment identified potential effects from vehicle emissions on roads within 200m of Cannock Chase SAC and Cannock Extension Canal SAC.

3.2 However, ecological assessment of these two sites has confirmed that, due to the characteristics of the habitats and the qualifying species within 200m of the roads, there will be no adverse effects on the integrity of these sites, due to air pollution.

LUC

November 2024

Appendix A

Natural England Regulation 19 consultation comments

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



Making a representation: We cannot accept anonymous representations. You must provide your contact details but only your name and comments will be published on the website. Your personal data will be held securely and processed in line with our privacy notice www.cannockchasedc.gov.uk/privacynotices. Once the plan is submitted your comments will be shared with the Planning Inspectorate and an independent inspector will review representations. You have the right to withdraw your representation and your data will be destroyed. Data will only be held until adoption of the Cannock Chase Local Plan.

Part B: Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**. We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Natural England
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Q1. To which document does this representation relate? (Please tick one box)

- Cannock Chase Local Plan 2018-2040
- Sustainability Appraisal of the Cannock Chase Local Plan 2018-2040
- Habitats Regulations Assessment of the Cannock Chase Local Plan 2018-2040

Q2. To which part of the document does this representation relate?

Please see Natural England's letter of 18 th March 2024 Ref: 465917
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Para-graph:	As above	Policy:	As above	Site:	As above	Policies Map:	As above
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Q3. Do you consider the Cannock Chase Local Plan is:

- A. Legally compliant Yes: No:
 - B. Sound Yes: No:
 - C. Compliant with the Duty to Co-operate Yes: No:
- (Please tick as appropriate).*

Cannock Chase Council: Cannock Chase Local Plan Representation Form



For office use	Part B reference	
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Q4. Please give details of why you consider the Cannock Chase Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Cannock Chase Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Do you consider that the Cannock Chase Local Plan 2018-2040 is Sound and Legally Compliant?

Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green infrastructure, biodiversity net gain and supporting a greener future. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.

Natural England has adopted a robust precautionary approach within this plan response and whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently **not sound or legally compliant due to the impacts of increased vehicle movement on air quality in relation to internationally designated nature conservation sites.**

Further detail relating to air quality is provided immediately below including the changes that we would consider necessary to make the plan sound. Natural England are engaged in continued discussion with your authority with regards to a Statement of Common Ground relating to air quality with a view to agreeing modifications in advance of the Examination if the council wishes.

Natural England have also provided other advice within the submission letter of 18th March 2024 ref: 465917 relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.

Air quality

Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the Plan and supporting documents, Natural England considers the pre-submission Plan in its current form is not sound or legally compliant for the reasons we have outlined immediately below relating to air quality.

The Local Plan's Habitat Regulations Assessment cannot rule out adverse effects on integrity in relation to air quality from vehicles at the following internationally designated sites:

- Cannock Chase Special Area of Conservation (SAC),
- Cannock Extension Canal SAC,
- Pasture fields Salt Marsh SAC,
- West Midland Mosses SAC
- Midlands Meres and Mosses Ramsar Phase 1 site.

This is due to a lack of evidence with regards to air quality and traffic data being collected, thus allowing mitigation works to be identified and secured. However, we are aware that traffic modelling data is nearing completion and air quality work is also making progress.

Cannock Chase Council: Cannock Chase Local Plan Representation Form



NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Additional Information is included in Natural England's letter of 18th March 2024 Ref: 465917 including but not limited to the following:

Discussions regarding air quality issues within the Local Plan and its evidence base are ongoing. Further work is required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter. This matter is also subject to ongoing discussions with the Cannock Chase Partnership, which Cannock Chase District Council is also a member of. Natural England will continue these discussions with the Partnership.

Habitats Regulations Assessment

We agree with the conclusion of the Habitats Regulation Assessment that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, cannot be ruled out due to a lack of evidence. Adverse effects on integrity have not been ruled out in relation to air quality from vehicles at Cannock Chase SAC, Cannock Extension Canal SAC, Pasturefields Salt Marsh SAC, and West Midland Mosses SAC and Midlands Meres and Mosses Ramsar Phase 1 site. Natural England are currently in discussion with your authority regarding air quality.

The HRA confirms that it is expected that the Appropriate Assessment wording will need to be amended once the traffic data and air quality assessment have been completed. The text should also acknowledge that there may be effects at other European sites besides Cannock Chase SAC and Cannock Extension Canal SAC. Natural England has specifically requested that the effects of ammonia are assessed; this should be added to the identified pollutants in the policy text.

Strategic Site Allocations

Natural England has concerns about several of the 'Strategic Residential Site Allocations' which could potentially impact on designated sites as a result of increased recreational pressure, water

Cannock Chase Council:
Cannock Chase Local Plan
Representation Form



quantity and quality and air. Specific assessments and mitigation measures are likely to be required to ensure habitats are protected and air and water quality are not adversely affected by development. These have not always been listed in the policy wording. We have particular concerns regarding the Green Belt allocations within the zone of influence of the Cannock Chase SAC and in close proximity to the Cannock Extension Canal SAC. We recommend the addition of a cross reference to policy SO7.3, to ensure the delivery of suitable mitigation for Cannock Chase SAC and the Cannock Extension Canal SAC.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:	
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Date:	21/03/2024
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Date: 18 March 2024
Our ref: 465917
Your ref: Reg 19 pre-submission draft - Cannock Local Plan 2018 - 2040



planningpolicy@cannockchasedc.gov.uk

BY EMAIL ONLY

Customer Services



Dear Sir/Madam

Cannock Chase Local Plan: Regulation 19 Pre-submission draft Plan 2018 - 2040

Thank you for your consultation dated and received by Natural England 5th March 2024.

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

Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green infrastructure, biodiversity net gain and supporting a greener future. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.

Natural England has adopted a robust precautionary approach within this plan response and whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently **not sound or legally compliant due to the impacts of increased vehicle movement on air quality in relation to internationally designated nature conservation sites.**

Further detail relating to air quality is provided immediately below including the changes that we would consider necessary to make the plan sound. Natural England are engaged in continued discussion with your authority with regards to a Statement of Common Ground relating to air quality with a view to agreeing modifications in advance of the Examination if the council wishes.

Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.

Do you consider that the Cannock Chase Local Plan 2018-2040 is Sound and Legally Compliant?

Air quality

Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the Plan and supporting documents, Natural England considers the pre-submission Plan in its current form is not sound or legally compliant for the reasons we have outlined immediately below relating to air quality.

The Local Plan's Habitat Regulations Assessment cannot rule out adverse effects on integrity in relation to air quality from vehicles at the following internationally designated sites:

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This is due to a lack of evidence with regards to air quality and traffic data being collected, thus allowing mitigation works to be identified and secured. However, we are aware that traffic modelling data is nearing completion and air quality work is also making progress.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Discussions regarding air quality issues within the Local Plan and its evidence base are ongoing. Further work is required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter. This matter is also subject to ongoing discussions with the Cannock Chase Partnership, which Cannock Chase District Council is also a member of. Natural England will continue these discussions with the Partnership.

Do you consider that the Cannock Chase Local Plan 2018-2040 is compliant with Duty to Co-operate?

In terms of Cannock Chase SAC and recreational impacts, the Local Plan 2018 - 2040 does comply with the Duty to Co-operate. Natural England can confirm that we have had discussions with the Local Authority regarding air quality issues within the Local Plan and its evidence base.

Other matters

Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to supporting green infrastructure and preventing fragmentation of habitats is provided below.

Vision and Strategy

Natural England advises that the Plan's vision and emerging development strategy addresses impacts and opportunities for the natural environment and sets out the environmental ambition for the Plan area. The Plan takes a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity and considering opportunities to enhance and improve connectivity. We welcome the aspiration to protect and enhance the environment and move towards a zero-carbon economy.

Strategic Objective 2: To create community facilities and healthy living opportunities across the district:

Natural England notes from the Sustainability Appraisal that the Indices of Deprivation 2019 illustrates that several neighbourhoods in Cannock Chase were amongst the 10% and 20% most deprived nationally in relation to poor health and shorter life expectancy in 2019. Rates of physical inactivity are below the England average.

All 5 parts of this policy are strongly supported by Natural England in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and community food growing sites.

We welcome this policy direction, specifically in reference to environmentally sustainable travel, energy efficiency, climate change, water and air quality, green and blue infrastructure. Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below.

If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the [Green Infrastructure Framework](#) and [Design Guide](#).

Natural England's [People and Nature survey](#) tells us that, for 82% of people '*being in nature makes me happy*'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at [Play England](#) and [Play Wales](#)) that have proven health and wellbeing value.

Evidence for nature play and health:

[Play, naturally: a review of children's natural play](#)

[Nature for health and wellbeing | The Wildlife Trusts](#)

[Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 \(naturalengland.org.uk\)](#)

Policy 4.4: Sustainable Tourism and the Rural Economy

We recommend that the supporting text refers to the mitigation for Cannock Chase Special Area of Conservation. This could be by cross reference to policy SO7.3 Habitats Sites.

Strategic Objective 5: Support provision of sustainable transport and communications infrastructure

Natural England notes the plans Integrated Impact Assessment findings with regards to car dependency in the area being amongst the highest in the UK and that without planning intervention

there is potential for further traffic growth and related implications for air quality in the district. Lack of existing service provision in some areas and the reduction in provision of local bus services also evidence the need for this policy, to support the provision of comprehensive transport networks, to help reduce social exclusion and unsustainable development impacts through low zero carbon transport and proposed recreational footpath and cycle routes.

Strategic Objective 7: Protect and enhance the natural environment.

Natural England strongly supports this group of 8 key policies to protect and enhance the natural environment and work with partners toward Nature Recovery. We welcome the inclusion of a biodiversity net gain policy (SO7.2) which in our view should contribute to significant improvements for both biodiversity and the wider environment in terms of cleaner air and water and to help restore, buffer, and connect existing environmental assets. We look forward to working with your authority on the scheme as it develops and provide further guidance below.

Midlands Heathland Heartland

We advise that the Midland's Heathland Heartland project should be added to Strategic Objective 7 as an initiative that will receive particular support. The project aims to better manage, protect, expand and enhance lowland heathland and associated habitats to improve biodiversity through a partnership approach from Cannock Chase to Sutton Park. The project will link and buffer existing sites while creating a network of further complementary habitats, while also providing new public access and recreational opportunities and health benefits. This links in with the government's [25 Year Environment Plan](#) and the Council aims to facilitate nature recovery networks. We would welcome it if offsite BNG could be directed to this area.

Policy SO7.1: Protecting, conserving and enhancing biodiversity and geodiversity

Natural England supports the inclusion of this policy.

Policy SO7.2: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Please note that the [Statutory Biodiversity Metric](#) is now available and replaces all previous versions. We would advise updating the policy accordingly.

Natural England would be pleased to agree amended policy wording with the Local Authority in advance of the Examination, if that would be of assistance.

Policy SO7.3: Habitats sites

Natural England supports the inclusion of this policy, which should ensure the protection and enhancement of the districts designated sites and the features for which they are designated including two Special Areas of Conservation: Cannock Chase; and the Cannock Extension Canal.

Policy SO7.5: Protecting, conserving, and enhancing the Cannock Chase National Landscape.

The Cannock Chase National Landscape forms 39% of the district and is under pressure from development. Natural England therefore welcomes the inclusion of a specific policy for the National landscape.

Policy SO7.6: Protecting, conserving, and enhancing the green belt

Policy SO7.7: amendments to the Green Belt.

Natural England notes that amendments to the Green Belt boundary are proposed in this Local Plan to accommodate the growth requirements of the district and the wider conurbation, including beyond the plan period, or following a review of this Plan. In Natural England's opinion the plan has been positively prepared in so far as it requires "Green Belt release in order to provide sufficient land to meet Cannock Chase District's housing need with an element of flexibility; A further 500 dwellings will be delivered to help meet a shortfall arising from the wider housing market area, (increasing total delivery 6,303 dwellings at a rate of 283 dwellings per annum;". However, we are concerned about the potential impacts of some of the sites selected on the natural environment.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, these site allocations in the green belt would result in the loss of Soil and Best and Most Versatile (BMV) agricultural land. This is contrary to draft plan policy SO8.5. The council should satisfy itself that it is making a balanced decision for sustainable development. We welcome the reference to the Defra Code of Practice for the sustainable use of soils, in paragraph 6.378. Natural England has no further comments on this matter.

Natural England has concerns about several of the '**Strategic Residential Site Allocations**' which could potentially impact on designated sites as a result of increased recreational pressure, water quantity and quality and air. Specific assessments and mitigation measures are likely to be required to ensure habitats are protected and air and water quality are not adversely affected by development. These have not always been listed in the policy wording. We have particular concerns regarding the Green Belt allocations within the zone of influence of the Cannock Chase SAC and in close proximity to the Cannock Extension Canal SAC. We recommend the addition of a cross reference to policy SO7.3, to ensure the delivery of suitable mitigation for Cannock Chase SAC and the Cannock Extension Canal SAC.

We previously advised a requirement for green/blue infrastructure to help alleviate increased recreational pressure on Cannock Chase SAC. It is noted that new community parks are proposed on part of the southern part of site SH1 and as compensation within site SE1. Natural England would be keen to work with your Authority to explore these mitigation measures further and ensure that spaces and interlinkages being created in these areas and beyond can support the greater carrying capacity of people that these additional housing allocations will bring.

Additional comments on specific sites:

- **SH1 - Land south of Lichfield Road A5190, Cannock;** The entire site is released from Green Belt for residential development and associated infrastructure. The site is directly adjacent to local biodiversity designations including: the Chasewater and the Southern Staffordshire Coalfield Heaths SSSI which is located approximately 800m east of the site.

The Cannock Chase SAC lies approximately 4.2km to the north of the site and the development will therefore be subject to the adopted charge which supports management of the SAC.

- **SH2 - Land east of Wimblebury Road;** The entire site is released from the Green Belt for residential development. The Chasewater and the Southern Coalfield Heaths SSSI lies close to the site's eastern boundary. The site is close to 2 locally designated Sites of Biological Importance. The Cannock Chase SAC lies approximately 3.3km to the north of the site. Development will be subject to the adopted charge which supports management of the SAC. The site is also hydrologically connected to Cannock Extension Canal SAC.
- **SE1 - Strategic Site-Specific Policy - Kingswood Lakeside Extension 2;** The site is located within a SSSI Impact Risk Zone. Development will be subject to the adopted charge which supports management of the SAC. This site will be released from the Green Belt for an extension to the existing employment land, with a net developable area of circa 8.6 ha (40% of site). Natural England notes that to compensate for the loss of land from the Green Belt, a new community park will be created which will enhance the existing habitats and increase biodiversity on site whilst providing public access for recreation and leisure use. The development will incorporate new or enhanced attenuation ponds and SUDS features.

Policy SA1: Site Allocations

Natural England welcomes the site-specific policies H1 through to SM1 - within the Allocations Section 6 of the plan including but not limited to:

- Incorporate existing hedgerows, trees and water courses where possible within the proposed development and provide suitable ecological mitigation and/or compensatory and enhancement measures within the site and green infrastructure connectivity.
- Incorporate new or enhanced attenuation ponds and SUDS features within the greenspace to provide suitable drainage systems on the site, subject to the findings of a site-specific flood risk assessment.
- Incorporate existing trees where possible within the proposed development and provide suitable ecological mitigation and/or compensatory and enhancement measures within the site and green infrastructure connectivity.
- Design of the development should be respectful of the proximity of the site to sensitive environmental and landscape designated areas including Cannock Chase National Landscape and Cannock Chase SAC.
- Incorporate suitable water harvesting and drainage systems on the site to minimise water use and limit water run-off from the site.
- Provide appropriate soft landscaping such as street trees and green roofs where possible, and enhancement features for wildlife where appropriate, within the scheme to benefit nature and enhance the street scene.

Policy SO7.8: Protecting, conserving and enhancing green infrastructure.

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

Natural England also supports the related allocation of safeguards including but not limited to:

- sites S1 to S3: to provide enhanced connectivity for active travel and biodiversity between Newlands Lane and Cannock Chase, including Fair lady Coppice, and across Hednesford road through to Wimblebury Road, Wimblebury mound and the former Bleak House open cast site and Chasewater and the Southern Staffordshire Coalfield Heaths SSSI.

- and site S4: to provide enhanced connectivity for recreation and walking and cycle routes along with a safe crossing between the area of the former Grove Colliery and Norton Canes village across the A5. There is potential to deliver enhancements to the biodiversity and strategic green infrastructure links to the Cannock Extension Canal SAC and enhance the habitat connectivity to Wyrley Common, the SBI fronting the A5 and the dismantled railway line which forms the district boundary. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, *Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure.*"

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the [Nature Recovery Network](#), alongside work to develop partnerships and to integrate nature into our incentives and land management activities.

Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
2. A written statement of biodiversity priorities.

[Statutory guidance for responsible authorities](#) explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature.

We expect local nature recovery strategies to propose actions such as the:

- creation of wetlands
- restoration of peatlands
- planting of trees and hedgerows
- more sustainable management of existing woodlands and other habitats like grasslands

These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Cannock Chase Local Plan 2018 – 2040 should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Cannock Chase District Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Lichfield District Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

Objective 8: Support a greener future.

Natural welcomes this groups of 7 policies that collectively focus on sustainable development and working toward achieving net zero including requirements for sustainable water management measures to reduce water use, natural flood protection features and sustainable drainage systems.

Policy SO8.5: Avoiding Air, Water, Noise or light pollution and soil contamination policy.

Natural England continues to work with the LPA on understanding air pollution in the area and has the following advice relating to the plans policies and supporting text relating to soils:

Soil and Best and Most Versatile agricultural land

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our well-being and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character, and the sustainability of the many ecosystem services they deliver, for example:

- Safeguard the long-term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.
- To avoid development that would disturb or damage other soils of high environmental value (e.g. wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc) and, where development is proposed.
- Ensure soil resources are conserved and managed in a sustainable way.

Currently within the plan best and most versatile agricultural land is referred within Objective 8.5 stating that "All major development proposals will protect and conserve soil resources and safeguard the best and most versatile agricultural land" There is however no definition of best and most versatile (BMV) agricultural land nor high quality agricultural land within the Plan, and this should be rectified.

The Council may find it helpful to look at [Natural England's Technical Information Note 049 on Agricultural Land Classification \(ALC\)](#) which describes the ALC system including the definition of BMV land, existing ALC data sources and their relevance for site level assessment of land quality and the appropriate methodology for when detailed surveys are required.

We would advise that the plan refers to sources of ALC and BMV mapping and data which will include but not limited to: the www.magic.gov.uk website and Natural England. For example [Agricultural Land Classification map West Midlands Region \(ALC004\)](#) and [Likelihood of Best and Most Versatile \(BMV\) Agricultural Land - Strategic scale map West Midlands Region \(ALC016_](#)

Policy SO8.6: Brownfield and despoiled land and under-utilised buildings policy.

Natural England recommends that the plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. We advise that the policy should support developments that enhance soils, avoid soil sealing and provide mitigation to avoid soil disturbance.

Habitats Regulations Assessment

We agree with the conclusion of the Habitats Regulation Assessment that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, cannot be ruled out due to a lack of evidence. Adverse effects on integrity have not been ruled out in relation to air quality from vehicles at Cannock Chase SAC, Cannock Extension Canal SAC, Pasturefields Salt Marsh SAC, and West Midland Mosses SAC and Midlands Meres and Mosses Ramsar Phase 1 site. Natural England are currently in discussion with your authority regarding air quality.

The HRA confirms that it is expected that the Appropriate Assessment wording will need to be amended once the traffic data and air quality assessment have been completed. The text should also acknowledge that there may be effects at other European sites besides Cannock Chase SAC and Cannock Extension Canal SAC. Natural England has specifically requested that the effects of ammonia are assessed; this should be added to the identified pollutants in the policy text.

For all other matters, Natural England confirms that we agree with the conclusions regarding adverse effects on the integrity of European sites being ruled out relating to physical loss of habitat, recreation pressure and water quantity/quality, due to safeguards provided within Local Plan policies. We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is c.125 kilometres away (in a direct line) but hydrologically connected to the rivers of Cannock Chase. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis.

For any further consultations on your plan, please contact: 

Yours sincerely



Sally McLaughlin
Lead Adviser

Hayley Fleming
Senior adviser

Land use planning – West Midlands Area Team

Planning for a Better Environment – West Midlands Team.

Appendix B

Attributes of European sites scoped into the HRA

Cannock Chase SAC

(1,244.2ha)

Qualifying Features

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

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 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. Investigations have revealed that former groundwater outflows that are now dry, and peat in situations too dry to currently lead to the formation of peat. Such features indicate that there has been a general reduction in elevation of groundwater outflows along the valley.
- Water quality – At present, neither Oldacre valley nor the Sher Brook valley are functioning correctly hydrologically to support the wetland habitats present (or those expected to be there) and both are showing signs of nutrient enrichment.
- 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.

Appendix B Attributes of European sites scoped into the HRA

- Invasive species - A range of invasive species are present on the SAC and on surrounding land.
- Lowland heathland vegetation is an especially fragile wildlife habitat and the fauna that live in it are restricted to it making them especially vulnerable to site impacts. One of the biggest threats to the special features of Cannock Chase is recreational disturbance and the direct and indirect damaging impacts it can have on the heathland's flora and fauna. Erosion, path widening, trampling, arson, pollution of soil from horse dung and dog waste can change the vegetation over time away from heathland and disturbance in the breeding season also directly harms reptiles and birds that nest on the ground in the open heathland.
- Inappropriate scrub control – average cover of scrub and trees is significantly over the target level for the heathland.
- Climate Change - the vulnerability of Cannock Chase SAC overall to climate change has been assessed by Natural England as being low, taking into account the sensitivity, fragmentation, topography and management of its habitats.

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 Chase is also a regional refuge for declining and vulnerable reptile species such as adder, common lizard, and slow worm.

Supplementary advice for qualifying features relating to air quality

H4010 Northern Atlantic wet heaths with *Erica tetralix*

Targets

Restore the concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for the H4010 wet heath feature of the site on the Air Pollution Information System (www.apis.ac.uk). The relevant Air Pollution Information System values relating to the air pollutants identified in the AQA (nitrogen deposition, ammonia and acid deposition) are as follows.

Table B.1: Air Pollution Information Systems Critical Load and Level values

Feature	Minimum critical load for nitrogen (KG/N/ha/yr)	Maximum critical load for nitrogen (KG/N/ha/yr)	Ammonia critical level (ug m-3)	Acid deposition critical level (MaxCLMinN)
H4010	5	15	1	1.035

This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.

Appendix B Attributes of European sites scoped into the HRA

Critical Loads and Levels are recognised thresholds below which such harmful effects on sensitive UK habitats will not occur to a significant level, according to current levels of scientific understanding. There are critical levels for ammonia (NH₃), oxides of nitrogen (NO_x) and sulphur dioxide (SO₂), and critical loads for nutrient nitrogen deposition and acid deposition. There are currently no critical loads or levels for other pollutants such as Halogens, Heavy Metals, POPs, VOCs or Dusts. These should be considered as appropriate on a case-by-case basis. Ground level ozone is regionally important as a toxic air pollutant but flux-based critical levels for the protection of semi-natural habitats are still under development.

It is recognised that achieving this target may be subject to the development, availability and effectiveness of abatement technology and measures to tackle diffuse air pollution, within realistic timescales.

Reason for restore: the Critical Loads and Levels are being exceeded at present and so are a threat to the wet heath feature, causing enrichment and acidification of its vegetation.

H4030 European dry heaths

Targets

Restore the concentrations and deposition of air pollutants to within the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System (www.apis.ac.uk). The relevant Air Pollution Information System values relating to the air pollutants identified in the AQA (nitrogen deposition, ammonia and acid deposition) are as follows.

Table B.2: Air Pollution Information Systems Critical Load and Level values

Feature	Minimum critical load for Nitrogen (KG/N/ha/yr)	Maximum critical load for nitrogen (KG/N/ha/yr)	Ammonia critical level (ug m-3)	Acid deposition critical level (MaxCLMinN)
H4030	5	15	1	1.035

This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.

Critical Loads and Levels are recognised thresholds below which such harmful effects on sensitive UK habitats will not occur to a significant level, according to current levels of scientific understanding. There are critical levels for ammonia (NH3), oxides of nitrogen (NOx) and sulphur dioxide (SO2), and critical loads for nutrient nitrogen deposition and acid deposition. There are currently no critical loads or levels for other pollutants such as Halogens, Heavy Metals, POPs, VOCs or Dusts. These should be considered as appropriate on a case-by-case basis. Ground level ozone is regionally important as a toxic air pollutant but flux-based critical levels for the protection of semi-natural habitats are still under development.

It is recognised that achieving this target may be subject to the development, availability and effectiveness of abatement technology and measures to tackle diffuse air pollution, within realistic timescales.

Reason for restore: the Critical Loads and Levels are currently being exceeded at present and are a threat to the dry heath feature, causing enrichment and acidification of the soil beyond the expected pH for a lowland heathland soil.

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

Key Vulnerabilities

- Water pollution – Targets for water quality to support Floating water-plantain (BOD level 'B', DO >70%, TP <20µg/l) were not met in recent (2015/16) water quality monitoring. Historic sediment loads into the canal have also occurred.
- Water levels – The Cannock Extension Canal has very little flow of water due to being a cul-de-sac off a long level section of the Wyrley & Essington Canal. There are no locks on either canal. The water-plantain *Luronium natans* population may face limitations in abundance due to the

restricted inflow from the southern end, which is insufficient to counteract leakage and evaporation.

- 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 - New Zealand pigmyweed *Crassula helmsii*, Water fern *Azolla filiculoides*, Water pennywort *Hydrocotyle ranunculoides*, and Parrot feather watermilfoil *Myriophyllum aquaticum* have been present on the canal in the recent past.
- Air pollution: risk of atmospheric nitrogen deposition - Nitrogen deposition exceeds site relevant critical load.
- Climate change - The overall vulnerability of this particular SAC to climate change has been assessed by Natural England as being high, taking into account the sensitivity, fragmentation, topography and management of its habitats/supporting habitats.

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.

Supplementary advice for qualifying features relating to air quality

S1831 Floating water-plantain *Luronium natans*

Targets

Restore as necessary the concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for these features of the site on the Air Pollution Information System (www.apis.ac.uk). The relevant Air Pollution Information System values relating to the air pollutants identified in the AQA (nitrogen deposition, ammonia and acid deposition) are as follows.
NOx, nitrogen deposition and ammonia

Table B.3: Air Pollution Information Systems Critical Load and Level values

Feature	Minimum critical load for nitrogen (KG/N/ha/yr)	Maximum critical load for nitrogen (KG/N/ha/yr)	Ammonia critical level (ug m-3)	NOx critical level (ug m-3)	Acid deposition critical level (MaxCLMinN)
S1831	2	10	3	30	n/a

This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.

Appendix B Attributes of European sites scoped into the HRA

Critical Loads and Levels are recognised thresholds below which such harmful effects on sensitive UK habitats will not occur to a significant level, according to current levels of scientific understanding. There are critical levels for ammonia (NH₃), oxides of nitrogen (NO_x) and sulphur dioxide (SO₂), and critical loads for nutrient nitrogen deposition and acid deposition. There are currently no critical loads or levels for other pollutants such as Halogens, Heavy Metals, POPs, VOCs or Dusts. These should be considered as appropriate on a case-by-case basis.

Ground level ozone is regionally important as a toxic air pollutant but flux-based critical levels for the protection of semi-natural habitats are still under development. It is recognised that achieving this target may be subject to the development, availability and effectiveness of abatement technology and measures to tackle diffuse air pollution, within realistic timescales.

The critical load for nitrogen is currently being exceeded at this site.

Appendix B Attributes of European sites scoped into the HRA

- For all other matters, Natural England confirms that we agree with the conclusions regarding adverse effects on the integrity of European sites being ruled out relating to physical loss of habitat, recreation pressure and water quantity/quality, due to safeguards provided within Local Plan policies. We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is c.125 kilometres away (in a direct line) but hydrologically connected to the rivers of Cannock Chase. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis.

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- 2 Natural England (2018) Natural England’s approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations,
<https://publications.naturalengland.org.uk/file/5431868963160064>
- 3 Sweco UK Ltd (2024) Assessment of Air Quality Impacts on European Sites in Staffordshire, Wolverhampton, Walsall, Sandwell, and Dudley
- 4 Natural England, Chartley Moss SSSI, Parcel 5 ‘RAILWAY – BUFFER’, Site information, Available at:
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- 5 Middlemarch on behalf of South Staffordshire District Council c/o the Combined Partnership Authorities (2023) Creation of an Air Pollution Evidence Base Brief to Support Local Plan HRA
- 6 Natural England (2018), approach to advising competent authorities on the assessment of road traffic emission under the Habitats Regulations, NEA001-2018, Available at:
<http://publications.naturalengland.org.uk/publication/4720542048845824>
- 7 Statement of Common Ground between Cannock Chase District Council, City of Wolverhampton Council, Dudley Metropolitan Borough Council, East Staffordshire Borough Council, Lichfield District Council, Sandwell Metropolitan Borough Council, Stafford Borough Council, South Staffordshire District Council, Walsall Council and Natural England in relation to air quality.
- 8 Obtained from the Natural England website: www.naturalengland.org.uk
- 9 Obtained from Natural England website:
<http://publications.naturalengland.org.uk/category/6490068894089216>

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- 10 Obtained from Natural England website:
<https://designatedsites.naturalengland.org.uk/Terrestrial/TerrestrialSiteDetail.aspx?SiteCode=UK0012672&SiteName=cannock&SiteNameDisplay=Cannock%20Extension%20Canal%20SAC&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=>
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- 13 This has been confirmed by email by the Canal and River Trust on 07/08/2023.
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- 15 Ricardo Energy and Environment Ltd (2022). Habitats Regulations Assessment of the Places for Everyone Joint Development Plan (Examination). Available at: <https://www.hwa.uk.com/site/wp-content/uploads/2022/10/PfE-Revised-HRA-Nov-2022.pdf>
- 16 UK Centre for Ecology & Hydrology, 2023. Factsheet - Ammonia. Available at: <https://www.ceh.ac.uk/sites/default/files/2023-11/UKCEH-ammonia-factsheet.pdf>
- 17 Ricardo Energy and Environment Ltd (2022). Habitats Regulations Assessment of the Places for Everyone Joint Development Plan (Examination). Available at: <https://www.hwa.uk.com/site/wp-content/uploads/2022/10/PfE-Revised-HRA-Nov-2022.pdf>
- 18 Ricardo Energy and Environment Ltd (2022). Habitats Regulations Assessment of the Places for Everyone Joint Development Plan (Examination). Available at: <https://www.hwa.uk.com/site/wp-content/uploads/2022/10/PfE-Revised-HRA-Nov-2022.pdf>

Report produced by LUC

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Bristol

12th Floor, Beacon Tower, Colston Street, Bristol BS1 4XE
0117 389 0700
bristol@landuse.co.uk

Cardiff

Room 1.04, 1st Floor, Brunel House, 2 Fitzalan Rd, Cardiff CF24 0EB
0292 254 0920
cardiff@landuse.co.uk

Edinburgh

Atholl Exchange, 6 Canning Street, Edinburgh EH3 8EG
0131 326 0900
edinburgh@landuse.co.uk

Glasgow

37 Otago Street, Glasgow G12 8JJ
0141 403 0900
glasgow@landuse.co.uk

London

250 Waterloo Road, London SE1 8RD
020 7199 5801
london@landuse.co.uk

Manchester

4th Floor, 57 Hilton Street, Manchester M1 2EJ
0161 802 2800
manchester@landuse.co.uk

Sheffield

32 Eyre Street, Sheffield, S1 4QZ
0114 392 2366
sheffield@landuse.co.uk

landuse.co.uk

Landscape Design / Strategic Planning & Assessment / Transport Planning
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