

# Stoke-on-Trent Local Plan

784-B026844

## Local Plan Habitats Regulations Assessment

**Stoke-on-Trent City Council**

**8 July 2026**

**Document prepared on behalf of Tetra Tech Limited. Registered in England number:  
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## Table of Contents

| <b>TABLE OF CONTENTS</b>                                                                                                                  |           |
|-------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| <b>EXECUTIVE SUMMARY .....</b>                                                                                                            | <b>1</b>  |
| <b>1.0 INTRODUCTION .....</b>                                                                                                             | <b>2</b>  |
| 1.1 Background to Local Plan .....                                                                                                        | 2         |
| 1.2 Requirement for HRA .....                                                                                                             | 3         |
| 1.3 Habitats Regulations Guidance .....                                                                                                   | 4         |
| <b>2.0 ASSESSMENT METHODOLOGY .....</b>                                                                                                   | <b>6</b>  |
| <b>3.0 SCOPE OF ASSESSMENT .....</b>                                                                                                      | <b>9</b>  |
| 3.1 Identification of Habitats Sites with Potential to be Affected by the Plan .....                                                      | 9         |
| 3.2 Determining the Zone of Influence .....                                                                                               | 9         |
| <b>4.0 STAGE 1: SCREENING ASSESSMENT .....</b>                                                                                            | <b>13</b> |
| 4.1 Is the Local Plan Directly Connected with or Necessary to the Management of<br>Habitats Sites for Nature Conservation Purposes? ..... | 13        |
| 4.2 Assessing Risk of Impact Pathways Leading to Likely Significant Effects .....                                                         | 13        |
| 4.3 Screening Assessment for Likely Significant Effects Alone .....                                                                       | 14        |
| <b>5.0 STAGE 2: APPROPRIATE ASSESSMENT .....</b>                                                                                          | <b>21</b> |
| 5.1 Habitats Sites affected by the Local Plan .....                                                                                       | 21        |
| 5.2 Air Pollution .....                                                                                                                   | 23        |
| 5.3 Recreation .....                                                                                                                      | 28        |
| 5.4 In-Combination Appropriate Assessment .....                                                                                           | 30        |
| <b>6.0 INTEGRITY TEST .....</b>                                                                                                           | <b>35</b> |
| <b>7.0 CONCLUSION .....</b>                                                                                                               | <b>37</b> |
| <b>8.0 REFERENCES .....</b>                                                                                                               | <b>38</b> |
| <b>FIGURES</b>                                                                                                                            | <b>41</b> |

## FIGURES

Figure 1: Local Plan Area

Figure 2: Habitats sites within 10km of Local Plan Area

Figure 3a: Midland Meres and Mosses Phase 1 Ramsar

Figure 3b: Midland Meres and Mosses Phase 2 Ramsar

Figures 4a – 4b: Air Pollution Deposition Zone of Influence

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## APPENDICES

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### APPENDIX A: REPORT CONDITIONS

## EXECUTIVE SUMMARY

**Table 1: Executive summary of report**

**Table detailing the scope and key findings of the report**

| Contents                               | Summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Scope of this Report</b>            | The purpose of this report is to assess the impact pathways, in the absence of mitigation, to likely significant effect of the Stoke-on-Trent City Council Local Plan upon the qualifying features of relevant Habitats sites (Habitats Regulations Assessment Screening (Stage 1 Assessment)), and subsequently assess whether these would result in an adverse effect on the integrity of these Habitats sites - thus proceeding to Appropriate Assessment (Stage 2 Assessment). This report is prepared under Regulation 105 of The Conservation of Habitats and Species Regulations 2017.                                                                                                                                              |
| <b>Stage 1: Screening Results</b>      | Following the screening assessment of potential impact pathways, it can be concluded that policies E1, E2, H1, H2, CCER5 and H9 could have a likely significant upon the Midland Meres and Mosses Phase 2 Ramsar site from indirect effects from air pollution deposition (from increased vehicle use) and recreational disturbance (from increased population).                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Stage 2: Appropriate Assessment</b> | The appropriate assessment has demonstrated that the Stoke-on-Trent City Council Local Plan will not have an adverse effect on site integrity either alone or in-combination with other plans and projects. Air pollution deposition is presently exceeding Site Relevant Critical Loads and Levels, whereby agricultural sources are the main contributing factor. Road transport accounts for between 4.8% and 6.81% of nitrogen deposition within the Habitats site. The Habitats site is also outside the Local Plan area – being 7.4km west at its nearest point. It has limited accessibility and is not well connected to public transport from Stoke-on-Trent. Increased recreation is not expected as a result of the Local Plan. |
| <b>Conclusion</b>                      | There will be no reduction on the condition of the qualifying features. The conservation objectives to maintain (or restore) each feature in favourable condition will not be impacted. The Stoke-on-Trent City Council Local Plan will not impede the achievement of the conservation objectives which are being, or will be, delivered under Article 6(1) or 6(2) of the Habitats Directive.                                                                                                                                                                                                                                                                                                                                             |

## 1.0 INTRODUCTION

Tetra Tech Ltd was commissioned by Stoke-on-Trent City Council in April 2026 to prepare a Habitats Regulations Assessment (HRA) for the emerging Stoke-on-Trent City Council Local Plan (SCCLP). The SCCLP incorporates the area displayed in Figure 1.

This report is required to establish the potential for the SCCLP to affect the qualifying features of any Habitats sites either alone or in combination with other plans or projects.

This report has been prepared by Principal HRA Specialist Ashley Endacott BSc (Hons). It has been reviewed by Principal Ecologist Charles Stamp BSc (Hons) and verified by Principal Ecologist Joe Salkeld BSc (Hons) MSc MCIEEM. The conditions pertinent to it are provided in Appendix A.

### 1.1 BACKGROUND TO LOCAL PLAN

The SCCLP aims to support the continued growth of Stoke-on-Trent whilst working within the overarching principles of sustainable development. The SCCLP seeks to balance economic, social and environmental objectives to meet the needs of today without compromising the ability of future generations to meet their own needs. The Local Plan will also support the principle of healthier communities and look to contribute to the health and wellbeing of our residents.

The SCCLP will guide the future development of Stoke-on-Trent. The Government places great importance on the production of the Local Plan and that decisions affecting an area should be planned. The SCCLP sets out how much development should happen over the plan period and where it will go. It also provides policies which guide the determination of planning applications.

The SCCLP will be a statutory development plan for Stoke-on-Trent and will ensure that long-term policies are in place to manage and meet the needs of local people and businesses for employment, housing, green space and supporting services. The timeframe covers 2020-2040 and is being produced in consultation with a wide range of stakeholders, statutory consultees and local people.

The SCCLP will replace the existing Core Spatial Strategy and the City Plan. Stoke-on-Trent strategic waste planning policies will continue to be dealt with through the separate Staffordshire and Stoke-on-Trent Waste Local Plan and is still part of the Local Development Framework.

The SCCLP has been produced in accordance with current legislation governing plan-making and is consistent with the National Planning Policy Framework (NPPF) (as revised) (MHCLG, 2024) and

associated Planning Practice Guidance (PPG) (Department for Levelling Up, Housing and Communities, 2024). The NPPF is clear that plans should provide a positive vision for the future of the plan area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

## **1.2 REQUIREMENT FOR HRA**

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The requirement for a HRA is established through Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, hereby referred to as the 'Habitats Directive', in Articles 6(3) and 6(4). The Habitats Directive is transposed into national legislation by the Habitats Regulations.

A HRA can only be performed by the plan-making authority as per Regulation 105. Tetra Tech, under Regulation 7(1)(c), are exercising the functions of Stoke-on-Trent City Council (as plan-making authority).

A HRA is an assessment of the potential impacts of a proposed project or plan on the conservation objectives of any European / Habitats site (as set out below) and, where necessary, an assessment of the efficacy and suitability of any mitigation and / or avoidance measures intended to preclude negative effects.

A European site is defined within the Habitats Regulations Regulation 8(1)<sup>1</sup> as:

- (a) a special area of conservation;
- (b) a site of Community importance which has been placed on the list referred to in the third sub-paragraph of Article 4(2) of the Habitats Directive (list of sites of Community importance);
- (d) an area classified pursuant to Article 4(1) or (2) of the old Wild Birds Directive or the new Wild Birds Directive (classification of special protection areas); or
- (e) a site which has been proposed to the European Commission under regulation 12, until such time as—

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<sup>1</sup> Regulation 8(1)(c) is omitted as per textual amendments in the Habitats Regulations

- (i) the site is placed on the list of sites of Community importance referred to in the third sub-paragraph of Article 4(2) of the Habitats Directive; or
- (ii) *agreement is reached or a decision is taken pursuant to Article 4(2) of that Directive not to place the site on that list*

Under the changes brought in through the Planning and Infrastructure Act 2025, Ramsar sites are to be assessed through Regulation 105 (1A) of the Habitats Regulations.

In line with the NPPF (MHCLG, 2024), and to help differentiate when describing habitats; European sites as set out in the NPPF Glossary are referred to as ‘Habitats sites’ within this report.

Additional areas are afforded protection as if they were European Sites. Paragraph 194 of the NPPF states that:

‘The following should be given the same protection as habitats sites:

- a) potential Special Protection Areas and possible Special Areas of Conservation;
- b) listed or proposed Ramsar sites; and
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.’

The impacts assessed within a HRA must include the direct, indirect and in-combination impacts of approving the plan or project, considered with any current or proposed activities, developments or policies impacting on the Habitat site. The potential impacts of projects and policies outside the Habitats sites, but potentially impacting upon them (i.e., negative effects upon functional habitat used by their qualifying features) must also be included in the assessment.

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### 1.3 HABITATS REGULATIONS GUIDANCE

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The HRA process undertaken by Tetra Tech has been developed to align with the long-established guidance set out in the HRA Handbook (DTA Publications, 2025). It is noted that as of January 2026, the HRA Handbook has been withdrawn. However, at the time of writing there is no further legislative or policy change that would alter the approach taken as part of this assessment. The



DTA HRA Handbook remains the most appropriate guide to support the HRA process in the United Kingdom.

HRA judgement (Holohan and Others v An Bord Pleanála, 2018) has been considered within this assessment. In summary this judgement provides further clarification about the scope of an Appropriate Assessment (AA), requiring that the assessment must:

- Catalogue the entirety of habitat types and species for which a Habitats site is protected.
- Identify and examine the implications of the plan or project for species present on the Special Protection Areas (SPAs) / Special Areas of Conservation (SACs) / Ramsar sites for which the site(s) in question has not been listed provided that those implications are liable to affect the conservation objectives of the site (i.e. if they are necessary to the conservation of the habitat types and species listed for the protected area(s)).
- Consider the implications for habitat types and species found outside the SPA / SAC / Ramsar sites provided that those implications are liable to affect the conservation objectives of the SPA / SAC / Ramsar site(s) in question (i.e. if they are necessary to the conservation of the habitat types and species listed for the protected area(s)).

In essence this is how a thorough HRA is carried out, as there may be other features supporting the Conservation Objectives of the Habitats site which are not actually listed as qualifying features, both within the boundary of the Habitats site and outside it.

## 2.0 ASSESSMENT METHODOLOGY

Under Regulation 105 of the Habitats Regulations, an AA needs to be carried out in respect of any land use plan which:

- (i) either alone or in-combination with other plans or projects would be likely to have a significant effect on a Habitats site; and
- (ii) is not directly connected with or necessary for the management of the Habitats site for nature conservation.

This report is concerned with Stage 1 (Screening for Likely Significant Effects (LSE)) Screening and Stage 2 – AA. Table 2 provides a summary of these stages of the process and Stage 3 - Derogations.

**Table 2. HRA Stages**

**Table sets out the stages of the HRA Process going through Stages 1 to 3 setting out what is assessed at each stage,**

| Stage                              | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Stage 1 - Screening for LSE</b> | <p>This is often called an assessment of LSE which is essentially a risk assessment, typically utilising existing data, records and specialist knowledge. The purpose of the test is to decide whether ‘full’ AA is required. The essential question is:</p> <p>“Is the plan, either alone or in-combination with other relevant projects and plans, likely to result in a significant effect upon Habitats sites?”</p> <p>A LSE is any effect which would undermine the conservation objectives of the Habitats sites. As a result of European case law, in</p> |

|                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     | <p>Waddenzee<sup>2</sup>, irrespective of the normal English meaning of ‘likely’, in this statutory context ‘a likely significant effect’ is ‘a possible significant effect.’</p> <p>If it can be demonstrated that significant effects will not occur, in the absence of mitigation, no further assessment is required. If this cannot be demonstrated, the assessment proceeds to Stage 2.</p>                                                                                                                                                                                                                                                                                                                                       |
| <b>Stage 2 - AA</b> | <p>Where it cannot be satisfactorily demonstrated that significant effects are unlikely, an AA is required. This stage is focussed entirely upon the qualifying features of the Habitats sites in question. The essential question here is:</p> <p>“Will the plan, either alone or in-combination with other relevant projects and plans, actually result in an adverse effect upon the integrity of any Habitats sites?”</p> <p>If it is concluded that adverse effects will occur, mitigation measures will be required to either avoid the impact in the first place, or to reduce the impact to such an extent that it is no longer adverse. Note that, unlike standard Ecological Impact Assessment, compensation for adverse</p> |

<sup>2</sup> The English-language version of the ruling may be read to mean that there is a need to establish a degree of probability of an effect. The translations of other languages are weaker and suggest that the test of significance is at a lower level. The test should therefore be understood as whether the plan or project concerned is capable of having an effect. It is in that sense that the English ‘likely to’ should be understood.

|                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                             | effects (i.e. creation of alternative habitat) is not permitted to be considered at the AA stage.                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Stage 3 -Derogations</b> | <p>Where an adverse effect cannot be avoided or reduced consent may only be granted as a derogation. This involves three legal tests that must be passed sequentially. The first test involves the examination of alternative ways of achieving the objectives and avoiding adverse impacts on the integrity of the Habitats sites. The second test is to demonstrate the proposals must proceed for imperative reasons of overriding public interest (IROPI). The third test is securing compensatory measures.</p> |

## **3.0 SCOPE OF ASSESSMENT**

### **3.1 IDENTIFICATION OF HABITATS SITES WITH POTENTIAL TO BE AFFECTED BY THE PLAN**

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Land use plans may have spatial implications beyond the jurisdiction of the plan-making authority. Specifically, it is recognised that the distance between a plan area and a Habitats site is not a definitive determinant as to the likelihood of an impact occurring or its severity. Site variables such as prevailing wind conditions, and surface and groundwater flow direction will all have an influence on the relative distance at which an impact can occur.

Additionally, the mobile nature of qualifying interest species must also be considered, since an adverse effect on the qualifying species of a Habitats site, even if these are present outside the Habitats site for which they are qualifying, may still result in a significant adverse effect on a Habitats site. Hence, a plan some distance away from a Habitats site could still have effects on the site and this, therefore, needs to be considered as part of the screening process.

This also means that both species and habitats which are present within the Habitat site's boundary or outside of the Habitats site should be considered even if they are not qualifying features, if they are supporting features that might affect the conservation objectives of the Habitats site if lost or damaged. This report has considered qualifying features as well as other habitats, flora and fauna that might be important in achieving the conservation objectives of the Habitats sites in question and maintaining site integrity.

### **3.2 DETERMINING THE ZONE OF INFLUENCE**

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The zone of influence (Zoi) used within this report was determined using a standard source-pathway-receptor model. In order for an effect to be established all three elements of this mechanism must be in place. The absence or removal of one of the elements of the mechanism is sufficient to conclude that a potential effect is not of any relevance or significance.

Receptors are the qualifying features of a Habitats site or are the ecological or environmental features supporting the qualifying features of a Habitats site. A source is any identifiable element of the SCCLP that is known to interact with the qualifying features, or the ecological or

environmental processes. The pathways are any connections or links between the source and the receptor.

A 10km ZOI search radius around SCCLP area site was used to identify any Habitats sites that could be adversely affected (Figures 2 and 3a – 3b). This is considered to be sufficient to capture all Habitat sites which may be impacted by the SCCLP. The search did not identify any Habitats sites within the SCCLP area.

The River Trent is located within the SCCLP area and is a tributary of Humber Estuary SAC, SPA and Ramsar. However, the Humber Estuary Habitats sites are located over 100 km from the SCCLP area. Whilst being hydrologically connected, the SCCLP does not contain new water pollution sources. Any pollutant would likely be diluted and dispersed over this distance before entering the Humber Estuary Habitats sites. The SCCLP is not expected to result in changes to river flows. The mobility of the mobile qualifying features of the Humber Estuary SAC (Sea lamprey *Petromyzon marinus*, River lamprey *Lampetra fluviatilis* and Grey seal *Halichoerus grypus*) are restricted by the presence of a number of weirs across the River Trent including Cromwell and Gunthorpe weirs. Since 2020 across 22 monitoring sites<sup>3</sup> on the River Trent the Environment Agency has only confirmed records of Brook lamprey *L. planeri* once (Environment Agency, 2026).

The River Trent also flows in proximity to the Cannock Chase SAC. However, since the Cannock Chase SAC is located 20km from the SCCLP area and the River Trent is only connected hydrologically downstream of the Cannock Chase SAC, additionally the qualifying features of the Cannock Chase SAC are not mobile features. It is therefore considered that the SCCLP is unlikely to have any impacts upon this Habitats site.

Similarly, West Midlands Mosses SAC and Midland Meres and Mosses Phase 1 Ramsar are located approximately within 15km from the SCCLP area but there is no hydrological connection.

Consequently, the Humber Estuary Habitats sites, Cannock Chase SAC, Midland Meres and Mosses Phase 1 Ramsar and West Midlands Mosses SAC are not considered further within this report.

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<sup>3</sup> Sites reviewed: Alrewa, Burton - Ferrybridge (match catch), Burton Gateway, Colwick Marina Net, D/S Park Brook, Essex Bridge – Netting, Farndon Net, Kneeton Net, Lupin Farm, Moat Farm, Gayton, Muskham Bridge Net, Nooning Lane Net, Q.M.C., Ratcliffe on Soar, Redhill, Marina, Royal Avenue, Safeway Stone, Sandy Point Net, Sawley Weir Net, Stoke Bardolph Net, Trentham and Wolseley Bridge

Table 2 below lists the Habitats sites identified that could be affected by the SCCLP and details the qualifying and supporting features, any threats to their integrity as identified in the Joint Nature Conservation Committee (JNCC) Standard Data Form and Ramsar Information Sheet (where applicable), and their high-level conservation objectives.

**Table 3. Site Selection.**

Table sets out the Habitats Site/s included in this assessment their qualifying features, threats and pressures and conservation objectives.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Habitats Site</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Midland Meres and Mosses Phase 2 Ramsar (UK11080)                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Distance and Direction from Plan Area</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Nearest unit 7.4km West                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Qualifying Features</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Threats and Pressures</b>                                                                                                                                                                                                | <b>Conservation Objectives</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p><b>Criterion 1</b></p> <p>The site comprises a diverse range of habitats from open water to raised bog.</p> <p><b>Criterion 2</b></p> <p>Supports a number of rare species of plants associated with wetlands, including the nationally scarce Cowbane <i>Cicuta virosa</i> and Elongated Sedge <i>Carex elongata</i>. Also present are the nationally scarce bryophytes <i>Dicranum affine</i> and <i>Sphagnum pulchrum</i>.</p> <p>Also supports an assemblage of invertebrates including several rare species. There are 16 species of British Red Data Book insect listed for this site including the following endangered species: the moth <i>Glyphipteryx lathamella</i>, the caddisfly <i>Hagenella clathrata</i> and the sawfly <i>Trichiosoma vitellinae</i>.</p> <p><b>Source:</b> JNCC (2008)</p> | <ul style="list-style-type: none"> <li>• Eutrophication</li> <li>• Introduction / invasion of non-native plant species</li> <li>• Pollution – pesticides / agricultural runoff</li> </ul> <p><b>Source:</b> JNCC (2008)</p> | <p>Natural England does not produce conservation objectives for Ramsar sites. The objectives for West Midland Mosses SAC (located 4.5km away from nearest point of Midland Meres and Mosses Phase 2 Ramsar) have been used a suitable proxy.</p> <p>The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the Favourable Conservation Status of its qualifying features, by maintaining or restoring:</p> <ul style="list-style-type: none"> <li>• the extent and distribution of qualifying natural habitats and habitats of the qualifying species</li> <li>• the structure and function (including typical species) of qualifying natural habitats</li> <li>• the structure and function of the habitats of the qualifying species</li> <li>• the supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</li> <li>• the populations of each of the qualifying species</li> <li>• the distribution of qualifying species within the site</li> </ul> <p><b>Source:</b> Natural England (2018)</p> |



## **4.0 STAGE 1: SCREENING ASSESSMENT**

### **4.1 IS THE LOCAL PLAN DIRECTLY CONNECTED WITH OR NECESSARY TO THE MANAGEMENT OF HABITATS SITES FOR NATURE CONSERVATION PURPOSES?**

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The SCCLP is not connected with and is not necessary for the management of any Habitats sites detailed in this report.

### **4.2 ASSESSING RISK OF IMPACT PATHWAYS LEADING TO LIKELY SIGNIFICANT EFFECTS**

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On evaluation of the conservation objectives of the Habitats sites, Table 3 evaluates the potential impact pathways to LSE as a result of the SCCLP. The threats and pressures listed are taken from the published JNCC standard data forms and Ramsar Information Sheet (where applicable).

In addition to the threats and pressures listed in Table 2, recreational pressure and air pollution are assessed within this report. This is on a precautionary basis due to the underlying elements of the SCCLP that may cause population numbers and vehicle use to increase.

In view of there being no Habitats sites within the SCCLP area, there is no possibility of there being any direct physical loss to Habitats sites. This is therefore not considered within this report.

A determination has been made and presented in Table 3 as to whether a LSE exists, and whether the SCCLP is required to proceed to Stage 2 AA.

### 4.3 SCREENING ASSESSMENT FOR LIKELY SIGNIFICANT EFFECTS ALONE

The assessment for LSE should look for the likelihood of a significant effect, and not the probability of a significant effect occurring. An effect is deemed likely if there is a real risk that it will occur. The feature-pressure interactions that are to be screened for LSE alone are listed in Table 3. All pressure interactions (except those screened out because, in the absence of mitigation, there is no full source-pathway-receptor model for impact) will be assessed at AA. Where there is collectively no LSE alone identified for each Habitats site, an in-combination LSE assessment is required (except in instances where the pressure will have a nugatory / *de minimis* effect alone).

**Table 4. Identifying pathways to LSE on the Midland Meres and Mosses Phase 2 Ramsar Sites**

**Table sets out the potential impact pathways on the Midland Meres and Mosses Phase 2 Ramsar Sites for each of the policies set out in the Local Plan**

| Policy                                    | LSE Alone                                                              | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------------------------------------|------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| S1 Sustainable Development                | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the approach to development. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                              |
| S2 Healthy Communities                    | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the approach to development and how they should contribute toward ensuring communities are healthy. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                       |
| S3 Infrastructure                         | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes how existing employment sites will be retained and managed. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                               |
| S4 Utilities and Telecommunications       | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather seeks to ensure that development provides sufficient utility and telecommunications infrastructure. Statutory undertakers are responsible for the supply and maintenance of services and are a competent authority under Reg 7(1)(a) of the Habitats Regulations. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.   |
| E1 Quantity of Employment Development     | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No | This policy encourages development by allocating 90 hectares of employment land within the SCCLP area. The policy itself does not stipulate the specific development type that may be pursued or their location. Alongside policy E2, employment development proposed under this policy could result in additional vehicles on the road network that subsequently may lead to increased nitrogen deposition upon Habitats sites. As this policy provides a source, a LSE cannot be excluded. This policy will be considered further at Stage 2 AA. |
| E2 Distribution of Employment Development | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No | This policy encourages various employment development types within the SCCLP area. Alongside policy E1, employment development proposed under this policy could result in additional vehicles on the road network that subsequently may lead to increased nitrogen deposition upon Habitats sites. As this policy provides a source, a LSE cannot be excluded. This policy will be considered further at Stage 2 AA.                                                                                                                               |

| Policy                         | LSE Alone                                                              | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|--------------------------------|------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| E3 Existing Employment Sites   | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes how new infrastructure will be supported by the local authority on a site-by-site basis. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                                                                               |
| E4 Tourism                     | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather seeks to ensure that development provides sufficient tourist amenity. This policy seeks to sustain and enhance the growth of the tourism economy by focusing on existing tourism assets which are generally cultural. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                            |
| H1 Housing numbers             | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No | This policy encourages development by seeking a minimum 19,040 new homes within the SCCLP area. Alongside policy H2, housing development proposed under this policy could result in additional private / personal vehicles on the road network that subsequently may lead to increased nitrogen deposition upon Habitats sites. The additional population may also result in increased recreational use. As this policy provides a source, a LSE cannot be excluded. This policy will be considered further at Stage 2 AA.                                                                                                                                      |
| H2 Housing Distribution        | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No | This policy encourages development of new homes within the SCCLP area. This includes sites allocated for residential development and development proposed within the Green Belt and outside of the sites allocated within the SCCLP. Alongside policy H1, housing development proposed under this policy could result in additional private / personal vehicles on the road network that subsequently may lead to increased nitrogen deposition upon Habitats sites. The additional population may also result in increased recreational use. As this policy provides a source, a LSE cannot be excluded. This policy will be considered further at Stage 2 AA. |
| H3 Affordable Housing          | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the affordable housing provision of residential development proposals. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                                                                                                 |
| H4 Housing Mix                 | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the mix of housing types for residential development proposals. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                                                                                                        |
| H5 Housing Standards           | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the housing standards required for residential development proposals. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                                                                                                  |
| H6 Older Persons Accommodation | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the provision of older persons accommodation from residential development proposals. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                                                                                   |

| Policy                                                         | LSE Alone                                                              | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------------------------|------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| H7 Self-Build and Custom-Build                                 | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather seeks to ensure the provision for self-build and custom-build development. Any self-build / custom-build development must be subject to a project level HRA. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                |
| H8 Housing in Multiple Occupation                              | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather seeks to ensure the provision for housing in multiple occupation (HMO) development. Any HMO development must be subject to a project level HRA. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                             |
| H9 Gypsy and Traveller and Travelling Showpeople Accommodation | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No | This policy encourages development by ensuring an adequate supply of sites for Gypsies and Travellers and Travelling Showpeople to meet identified needs within the SCCLP area. Alongside policies H1 and H2, sites for Gypsies and Travellers and Travelling Showpeople proposed under this policy could result in additional private / personal vehicles on the road network that subsequently may lead to increased nitrogen deposition upon Habitats sites. The additional population may also result in increased recreational use. As this policy provides a source, a LSE cannot be excluded. This policy will be considered further at Stage 2 AA. |
| C1 The Role of Centres                                         | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the approach that directs main town centre uses to meet the needs, scale and type of development required. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                                                        |
| C2 New Retail and Leisure Development                          | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the approach that directs new retail and leisure development within existing centres. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                                                                             |
| C3 Edge and Out-of-Centre Development                          | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the approach that directs how main town centre uses in edge or out-of-centre locations will need to be justified by project proposers. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                            |
| C4 Residential Development in Centres                          | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the approach that directs residential development within existing centres. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                                                                                        |
| C5 Hanley (City Centre)                                        | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the use within the existing centre of Hanley. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                                                                                                                     |
| C6 Supporting Local Communities                                | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather allows for development proposals that support social interaction and active lifestyles in local communities. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                                                                |

| Policy                                                          | LSE Alone                                                              | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------------------------------------------------------|------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C7 Night-Time Economy                                           | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes development that supports the night-time economy in existing urban areas. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                 |
| C8 Hot Food Takeaways                                           | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes development that provides hot food takeaways in existing urban areas. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                     |
| T1 Sustainable Transport and Travel                             | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the approach to development that minimises the need to travel and prioritises sustainable transport. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                      |
| T2 Active Travel                                                | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the approach to development that improves accessibility and air quality by reducing vehicle use and promoting cycling, walking or wheeling. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                               |
| T3 Public Transport                                             | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the approach to development that private vehicle use. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                     |
| T4 Transport Assessments, Transport Statements and Travel Plans | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather seeks to ensure the effects of increased vehicles movements are assessed. The effects upon roads that are within 200m of a Habitats site must be considered in a project level HRA. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report. |
| T5 Parking                                                      | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather seeks to ensure development provides necessary parking provision. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                   |
| T6 Air Quality                                                  | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the approach to managing air quality from development within the Air Quality Management Area that covers the entire city. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                 |
| D1 Residential Design                                           | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the design requirements for residential development proposals. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                            |

| Policy                               | LSE Alone                                                              | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------|------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| D2 Non-Residential Design            | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the design requirements for non-residential development proposals. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                   |
| CH1 Historic Environment             | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the preservation of heritage assets. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                 |
| CH2 Archaeology                      | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the preservation of archaeological assets. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                           |
| CH3 Chatterley Whitfield             | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy encourages development by making use of an existing area. The policy itself does not stipulate the specific development type that may be pursued. Any development may need a project level HRA depending on the specifics of the development. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report. |
| CH4 Spode                            | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy encourages development by making use of an existing area. The policy itself does not stipulate the specific development type that may be pursued. Any development may need a project level HRA depending on the specifics of the development. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report. |
| NA1 Green and Blue Infrastructure    | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the measures to improve, link and maintain green and blue infrastructure and corridors. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                              |
| NA2 Open Space, Sport and Recreation | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the provision of open space, recreation and sport facilities within the plan area. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                   |
| NA3 Biodiversity and Geodiversity    | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the council statutory obligations to protect designated sites and protected species. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                 |
| NA4 Trees and Woodland               | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather seeks to ensure the effects upon trees and hedgerows are addressed by project proposers. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                       |
| CCER1 Climate Change                 | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the climate change considerations across development types. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                          |



| Policy                                          | LSE Alone                                                              | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------|------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CCER2 Renewable and Low Carbon Energy           | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the renewable energy considerations across development types. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                                                                                   |
| CCER3 Flood Risk and Water Management           | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes how development must consider the environmental impact upon hydrology. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                                                                                                                                                                                                                                                                          |
| CCER4 Sustainable Drainage and Water Management | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather describes the expectations for sustainable drainage and water management within development, and ensuring adequate sanitation and pollution controls. The council will not support development that would result in an unacceptable impact on the quality and yield of local water resources, the water environment, and biodiversity. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report.                    |
| CCER5 Minerals                                  | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No | This policy encourages mineral extraction proposals within the SCCLP area. Development proposed under this policy could result in additional vehicles on the road network that subsequently may lead to increased nitrogen deposition upon Habitats sites. As this policy provides a source, a LSE cannot be excluded. This policy will be considered further at Stage 2 AA.                                                                                                                                                                                                                                                             |
| CCER6 Waste                                     | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | This policy will not itself lead to development but rather establishes the expectations for waste management in the SCCLP area. The council is currently part of the Staffordshire and Stoke-on-Trent Joint Waste Plan (Staffordshire County Council and Stoke-on-Trent City Council, 2013). The Joint Waste Plan requires a project level HRA at planning application stage for proposals for waste management use. This policy does not provide a source or a pathway for there to be any effect either alone or in-combination with other plans or projects. This policy is screened out of further consideration within this report. |



#### **4.3.1 Summary of LSE Alone Screening Assessment**

Upon reviewing the feature-pressure interactions, it is considered that the SCCLP will have an LSE alone upon the Midland Meres and Mosses Phase 2 Ramsar site from the following policies:

- E1 Quantity of Employment Development;
- E2 Distribution of Employment Development;
- H1 Housing numbers;
- H2 Housing Distribution;
- CCER5 Minerals; and
- H9 Gypsy and Traveller and Travelling Showpeople Accommodation

These policies establish a source that could utilise existing pathways to have a likely significant effect upon the receptors. The sources considered at Stage 2 AA will be:

- Air pollution deposition
- Recreation

There are no Habitats sites within the SCCLP area. The SCCLP is therefore not capable of introducing non-native plant species, nor is it capable of introducing or displacing the use of pesticides / agricultural runoff where it could have an effect upon the identified Habitats sites. Similarly, the Midland Meres and Mosses Phase 2 Ramsar sites are not hydrologically connected to the SCCLP area, and the SCCLP does not propose policies that could introduce or increase nutrients that could result in eutrophication. Consequently, these pressures are not considered further in this HRA.



## 5.0 STAGE 2: APPROPRIATE ASSESSMENT

The following sections discuss the pathways that have a LSE and which could result in impacts on the integrity of the Habitats sites identified during Screening.

The DTA Handbook (DTA Publications, 2025) states that ‘*The assessment must be of the implications of the plan or project, for the qualifying features of the site, in view of the site’s conservation objectives, in light of the best scientific knowledge in the field. The assessment should also address the implications of the proposed plan or project for habitat types and species to be found outside the boundaries of the site if those implications may affect the achievement of the conservation objectives of the site.*’

The AA should also include consideration of the conservation status of the qualifying feature(s) in the Habitat site(s) and Habitats sites’ condition.

The conclusions of the AA must inform the Integrity Test. The outcome of the Integrity Test will influence the decision made by the plan-making authority. Under Regulation 105(4) “...*the plan-making authority must give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site...*”

The AA therefore provides an objective and scientific assessment necessary to enable the plan-making authority to make its decision in respect of site integrity with an appropriate degree of confidence.

### 5.1 HABITATS SITES AFFECTED BY THE LOCAL PLAN

#### 5.1.1 Midland Meres and Mosses Phase 2 Ramsar Site

The Midland Meres and Mosses Phase 2 Ramsar site has a combined area of 1593.14 hectares (Ha) (Natural England, 2026) which is split across 18 component units across Wrexham, Shropshire, Cheshire and Staffordshire Plain (JNCC, 2008).

The Habitats site forms a geographically diverse series of lowland open water and peatland sites in the north-west Midlands of England and north-east Wales. These have developed in natural depressions in the glacial drift left by receding ice sheets which formerly covered the Cheshire/Shropshire Plain. The 18 component sites include open water bodies (meres), the

majority of which are nutrient-rich with associated fringing habitats, reed swamp, fen, carr and damp pasture. Peat accumulation has resulted in the nutrient-poor peat bogs (mosses) forming in some sites on the fringes of the meres or completely infilling basins. In a few cases the result is a floating quaking bog or schwingmoor. The wide range of resulting habitats support nationally important flora and fauna (JNCC, 2008).

The Habitats site's primary interest is its wide range of lowland wetland types and successional stages within a distinct biogeographical area. Waters are generally circumneutral or acidic depending on the component site's soil type, catchment size and usage. Substantial areas of open water remain in some sites, and in many cases this is fringed by extensive and varied swamp, fen and carr communities. Some basins have become peat-filled, leading in some circumstances to the development of ombrotrophic conditions; of particular importance are the quaking bogs or schwingmoors (JNCC, 2008).

Figure 3b indicates that two units are present within 10km of the SCCLP area. The northern most unit is underpinned by Oakhanger Moss Site of Special Scientific Interest (SSSI). This SSSI has an area of 13.56Ha (Natural England, 2012a). Oakhanger Moss shows succession from open water to raised bog. It contains a range of mire habitats, from swamp and willow carr to fen and Sphagnum-dominated bog communities, supporting a mix of common and uncommon plants. Its vegetation pattern reflects differences in water level, nutrient supply and peat development, while nearby peatlands such as Bibby's Moss and White Moss provide useful comparisons. The site is also ecologically notable for its protected Adder *Vipera berus* population, adding to its conservation value within the wider Midlands meres and mosses landscape (Natural England, 2012a).

The most recent condition assessment indicates that the features of the SSSI are in unfavourable condition (Natural England, 2012b).

The southern most Ramsar unit within 10km of the SCCLP area is underpinned by the Black Firs & Cranberry Bog SSSI. This SSSI is 11.00Ha (Natural England, 2021a) and is an outstanding example of a schwingmoor basin mire, a nationally rare habitat and one of only two such sites in Staffordshire. It is unusually rich in bog and fen species for its small size, with a central floating lawn of bog mosses showing a distinctive hummock-and-hollow structure that indicates long-term stability and little human disturbance. The open water area, Black Mere, is the surviving part of a

former kettle-hole lake and the county's largest dystrophic open water, while the surrounding wetland habitats are nationally threatened because of drainage and groundwater enrichment.

The mire supports a clear transition from acidic bog vegetation in the centre to nutrient-rich fen and carr woodland around the edges. Characteristic plants include Cranberry *Vaccinium oxycoccus*, Round-leaved sundew *Drosera rotundifolia*, Cross-leaved heath *Erica tetralix* and cottongrass *Eriophorum angustifolium* on the floating bog lawn, with Willows *Salix spp.*, Alder *Alnus glutinosa* and Birch *Betula pubescens* forming the surrounding fen lagg. The site is also important for wildlife, including rare moths and aquatic insects, while the nearby Black Firs woodland is a modified peat-filled valley alderwood that still retains uncommon wetland plants such as royal fern *Osmunda regalis*. Together, the two areas form a highly significant and diverse wetland and woodland complex (Natural England, 2021a).

The most recent condition assessment indicates that the features of the SSSI are in unfavourable condition (Natural England, 2021b).

## 5.2 AIR POLLUTION

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The screening assessment identified that the following policies could lead to indirect increases in air-pollution deposition because of associated increased vehicle use:

- E1 Quantity of Employment Development;
- E2 Distribution of Employment Development;
- H1 Housing numbers;
- H2 Housing Distribution;
- H9 Gypsy and Traveller and Travelling Showpeople Accommodation; and
- CCER5 Minerals.

Deposition of air pollution can lead to the nutrient enrichment and acidification of soils, encouraging more tolerant ruderal species at the expense of sensitive plant, lower plant and invertebrate communities. In high concentrations, ammonia (NH<sub>3</sub>) can result in direct toxic effects on vegetation, a factor which may also be true of Nitrogen Oxides (NO, NO<sub>2</sub> or NO<sub>x</sub>). Larger animals, such as small mammals and birds are considered immune to direct effects but can be vulnerable to change in their supporting habitats. Furthermore, it can exacerbate the effects of other factors such as climate change or pathogens.

The Guidance on Decision-making Thresholds document (Chapman & Kite, 2021) explains that a spatial boundary of 10km from a local authority boundary provides an appropriate spatial limit on strategic level HRAs for air pollution.

It is noted that concentrations of air pollution become indistinguishable from background levels beyond 200m from source (Chapman & Kite, 2021; Holman et al., 2020). This does not mean that the impact falls to zero; rather the impact becomes so well dispersed that the effect is largely indistinguishable from that at even greater distances. This, in turn, means that the precise location of a development site within the SCCLP is only significant within its immediate vicinity. These may have a small and unquantifiable impact on 'background' concentrations and fluxes over a very wide area, but this impact will occur regardless of the precise location and is in any case built into the Nitrogen Futures modelling (Dragosits, et al., 2020). The location of development sites within the SCCLP are therefore fundamental to understanding the impact within their immediate surroundings only and are less important when assessing effects upon Habitats sites that are outside the jurisdiction of the plan-making authority.

A review of background air quality trends provided by the Air Pollution Information System (APIS) (UK Centre for Ecology and Hydrology, 2026) indicates that there was an overall decrease in nitrogen and acid deposition at the SSSIs between 2003 and 2021. This may be attributed to national initiatives such as improvements in vehicle technologies (new standard Euro 6/VI vehicles).

When looking at the need to undertake an AA, the criteria set by JNCC (Air Quality Consultants Ltd, 2021; Chapman & Kite, 2021) and Natural England (2025) is an exceedance of 1% of the Critical Level or Critical Load of the following air pollutants:

- $\text{NH}_3$ ;
- $\text{NO}$ ;
- $\text{NO}_2$ ;
- $\text{NO}_x$ ;
- Nitrogen (N) deposition;
- Acid deposition; and

- Sulphur dioxide (SO<sub>2</sub>).

For vehicle emissions, the JNCC screening criteria (Chapman & Kite, 2021) describes that the relevant pollutants from road traffic are NH<sub>3</sub>, NO<sub>x</sub> and N.

The units of the Midland Meres and Mosses Phase 2 Ramsar Site that are within 10km of the SCCLP area are both within 200m from the nearest road. The unit underpinned by the Oakhanger Moss SSSI unit is approximately 120m from the M6 motorway. The unit underpinned by the Black Firs & Cranberry Bog SSSI is adjacent to the A531 and within 80m of the B5500.

Data from the APIS (UK Centre for Ecology and Hydrology, 2026), presented below in Table 4, shows the minimum Critical Loads (Kilograms of N per hectare per year (Kg/N/ha/yr)) and Critical Levels (micrograms of NH<sub>3</sub> or NO<sub>x</sub> per cubic metre (µg/m<sup>3</sup>)) for the underpinning SSSIs.

**Table 4. Minimum Critical Loads and Critical Levels and 1% Threshold**

**Table sets out the Minimum Critical Loads and Critical Levels and 1% Threshold for Nitrogen, NH<sub>3</sub> and Nox for the Oakhanger Moss SSSI and the Black Firs & Cranberry Bog SSSI**

**Oakhanger Moss SSSI**

|                                      | N Critical Load<br>(Kg/N/ha/yr) | NH <sub>3</sub> Critical Level<br>(µg/m <sup>3</sup> ) | NO <sub>x</sub> Critical Level<br>(µg/m <sup>3</sup> ) |
|--------------------------------------|---------------------------------|--------------------------------------------------------|--------------------------------------------------------|
| <b>Minimum Critical Loads/ Level</b> | 5                               | 1                                                      | 30                                                     |
| <b>1% Threshold</b>                  | 0.05                            | 0.01                                                   | 0.3                                                    |

**Black Firs & Cranberry Bog SSSI**

|                                      | N Critical Load<br>(Kg/N/ha/yr) | NH <sub>3</sub> Critical Level<br>(µg/m <sup>3</sup> ) | NO <sub>x</sub> Critical Level<br>(µg/m <sup>3</sup> ) |
|--------------------------------------|---------------------------------|--------------------------------------------------------|--------------------------------------------------------|
| <b>Minimum Critical Loads/ Level</b> | 5                               | 1                                                      | 30                                                     |
| <b>1% Threshold</b>                  | 0.05                            | 0.01                                                   | 0.3                                                    |

Furthermore, Table 5 shows the range of the modelled rate of deposition between the 1km grid squares of the SSSIs as documented in APIS at the time of writing. On a precautionary basis, this does not include the grid average results for N deposition which do not provide the necessary level of detail.

**Table 5. Summary of modelled Critical Loads and Critical Levels**

**Table summarises the modelled levels of N NH<sub>3</sub> and NO<sub>x</sub> for the Oakhanger Moss SSSI and the Black Firs & Cranberry Bog SSSI**

| SSSI                                  | N deposition for forest (Kg/N/ha/yr) | N deposition for moorland (short vegetation) (Kg/N/ha/yr) | NH <sub>3</sub> concentration (µg/m <sup>3</sup> ) | NO <sub>x</sub> concentration (µg/m <sup>3</sup> ) |
|---------------------------------------|--------------------------------------|-----------------------------------------------------------|----------------------------------------------------|----------------------------------------------------|
| <b>Oakhanger Moss</b>                 | 43.9 – 44.4                          | 24.2 – 24.5                                               | 3.2 – 3.3                                          | 9.6                                                |
| <b>Black Firs &amp; Cranberry Bog</b> | 44.8 – 46.5                          | 24.7 – 25.6                                               | 3.3 – 4                                            | 7.8 – 8.3                                          |

When comparing the data in Table 5, with the Critical Loads and Critical Levels in Table 4, it can be established that the N deposition upon both forest and moorland (short vegetation), and NH<sub>3</sub> concentration is already in exceedance of the respective Critical Loads and Levels. The concentration of NO<sub>x</sub> is below the Critical Level.

Additionally, the source attribution on APIS (UK Centre for Ecology and Hydrology, 2026) shows that of the local contributions to N deposition, road transport accounts for 6.81% of the deposition within the Oakhanger Moss SSSI. The largest contribution comes from livestock at 56.1%. The trend for the contribution from road transport is also decreasing from 0.99 Kg/N/ha/yr in 2012 to 0.62 Kg/N/ha/yr in 2018 (the latest reading available on APIS). A similar picture is shown at Black Firs and Cranberry Bog SSSI. The source attribution on APIS (UK Centre for Ecology and Hydrology, 2026) shows that of the local contributions to N deposition, road transport accounts for 4.8% of the deposition within the SSSI. The largest contribution comes from livestock at 54.9%. The trend for the contribution from road transport is also decreasing from 1 Kg/N/ha/yr in 2012 to 0.58 Kg/N/ha/yr in 2018 (the latest reading available on APIS). At both SSSIs, the trend for livestock contribution is increasing and the contribution from road transport accounts for less than the critical loads (Oakhanger moss ~3.02 Kg/N/ha/yr and for Black firs ~2.2 Kg/N/ha/yr)

Taking into consideration the small contribution of traffic sources to baseline nitrogen levels, decreasing pollution trends, the contribution of policies in the Local Plan, county and national

initiatives, it is considered that there will be no adverse impact on site integrity at the Midland Meres and Mosses Phase 2 Ramsar due to changes in air quality. As the SCCLP does not give quantifiable information to assess in detail any air pollution effects, this pressure will next be considered at an in-combination AA.

### 5.3 RECREATION

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The screening assessment identified that the following policies could lead to increases in recreational disturbance as a result of associated population increase and vehicle use:

- H1 Housing numbers;
- H2 Housing Distribution;
- H9 Gypsy and Traveller and Travelling Showpeople Accommodation

The SCCLP indicates the aim is to provide a minimum of 19,040 new homes throughout the plan period. When using an average of 2.4 people per dwelling, the SCCLP could result in a population increase of 45,696. This figure however is highly precautionary, as it does not account for existing residents within the SCCLP area moving into new build properties.

That said, the SCCLP also describes the city area as having a unique and distinct natural environment, with many unique brownfield sites rich in wildlife such as Chatterley Valley and numerous parks such as Park Hall Country Park and Berryhill Fields. The council will seek to promote positive improvements to the quality and quantity of the natural environment through securing measurable net gains for biodiversity, which are proportionate to the size, scale and impact of the development proposed.

Policies D3, S3, NA1, NA2 are all designed to support and enhance recreation, green and blue corridors and public amenity within the SCCLP area. Policy NA2 in particular requires applicants to provide an open space or sport and recreation assessment which considers the existing quantity, quality and accessibility of green space and sport and recreation to determine the appropriate provision as part of new development.

Furthermore, neither of the SSSIs that underpin the Midland Meres and Mosses Phase 2 Ramsar units are easily accessible. The Oakhanger Moss SSSI is on privately owned land. No car parks are provided, and no direct bus routes operate from the SCCLP area either.



Black Firs and Cranberry Bog SSSI is managed by the Wildlife Trust, in partnership with Natural England, to monitor the site and plan for its long-term protection. Direct public access to the Cranberry Bog section is not permitted because of its sensitivity and the presence of the Schwingmoor basin mire, which is unstable and potentially hazardous. Public access is available to the Black Firs section via a Public Right of Way along the southern boundary of the SSSI. There is a small circular walk around the Black Firs area, although it is not promoted as a visitor attraction. The site does not have any Wildlife Trust facilities (Staffordshire Wildlife Trust, 2026).

With the existing provision of recreation space within the SCCLP area, combined with the small area and limited accessibility of the underpinning SSSIs, it is considered that there would not be an adverse effect on site integrity from recreational disturbance affecting the qualifying features of the Habitats sites. As the SCCLP does not give quantifiable information to assess in detail any recreational effects, this pressure will next be considered at an in-combination AA.

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## 5.4 IN-COMBINATION APPROPRIATE ASSESSMENT

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The threats and pressures assessed within this section are those where the effects are small scale and no mitigation is available to avoid or reduce the effect as per Sections 5.2 and 5.3.

In-combination effects are those which when considered alone are not significant, but when combined with the effects of other plans and projects reach a significant level (for example through addition). The scope of an in-combination assessment should only consider the following (DTA Publications, 2025):

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

In respect of f) and g) above, relevance to the in-combination assessment would depend on the timing or programming of proposals in the plan.

It is also necessary to understand the associated mitigation measures within any other plans or projects. If effects from other plans and projects are fully mitigated against, there are no outstanding effects to consider that could act in-combination.

Plan-making authorities are also entitled to exercise judgement as to which plans or projects are included in an in-combination assessment, and that there must be a degree of flexibility in an in-combination assessment (Walton v Scottish Ministers 2011 CSOH 131). In that judgement, reference was made to an answer given by the European Commission to a Member of the European Parliament (P-0917/05; 22 April 2005) in which it was said that the in-combination provision must be applied in a manner that is proportionate to the timing, planning stage and legality of the proposed plans and projects.

A review of relevant data sources has been conducted which has identified the following plans and projects (see Table 6) that could act in-combination with the SCCLP to have an adverse effect from air pollution deposition and recreational disturbance.

**Table 6. In-combination assessment for the Midland Meres and Mosses Phase 2 Ramsar Site**

The table sets out the potential for an Possible Adverse Effect on Site Integrity In-Combination with the local plan from other plans and projects identified in the surrounding area.

| Plan or Project                                                                                                               | Possible Adverse Effect on Site Integrity In-Combination               | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Cheshire East Local Plan<br><br>(Cheshire East Council, 2017; 2020)                                                           | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | The only Habitats sites screened in for assessment are the River Dee and Bala Lake SAC. This is not connected to the SCCLP. There will not be an in-combination effect upon the Midland Meres and Mosses Phase 2 Ramsar Site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Newcastle-under-Lyme Local Plan<br><br>(Newcastle-under-Lyme Borough Council, 2024a; 2024b; 2024c)                            | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | The Newcastle-under-Lyme Local Plan HRA concludes the local plan will not have an adverse effect upon the Midland Meres and Mosses Phase 2 Ramsar Site from air pollution deposition and recreation. There will not be an in-combination effect upon the Midland Meres and Mosses Phase 2 Ramsar Site.                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Humber River Basin Management Plan<br><br>(Environment Agency, 2022)                                                          | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | The SCCLP is incapable of affecting any downstream Habitats sites. The Midland Meres and Mosses Phase 2 Ramsar Site are not hydrologically connected to the SCCLP area and no activities within the Humber River Basin Management Plan are capable of affecting the Ramsar. There will not be an in-combination effect upon the Midland Meres and Mosses Phase 2 Ramsar Site.                                                                                                                                                                                                                                                                                                                                                |
| Severn Trent Water Water Resource Management Plan<br><br>(Severn Trent Water, 2024; 2025)                                     | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | No pathways identified to the Midland Meres and Mosses Phase 2 Ramsar Site within the Water Resource Management Plan. The only LSEs identified in the Water Resource Management Plan are related to surface water and ground water hydrology. The SCCLP is incapable of affecting hydrology. There will not be an in-combination effect upon the Midland Meres and Mosses Phase 2 Ramsar Site.                                                                                                                                                                                                                                                                                                                               |
| South Staffordshire Water Resource Management Plan<br><br>(South Staffordshire Water, 2024a; 2024b)                           | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | No pathways identified to the Midland Meres and Mosses Phase 2 Ramsar Site within the Water Resource Management Plan. The only LSEs identified in the Water Resource Management Plan are related to the River Mease SAC. The SCCLP is incapable of affecting the River Mease SAC. There will not be an in-combination effect upon the Midland Meres and Mosses Phase 2 Ramsar Site.                                                                                                                                                                                                                                                                                                                                          |
| Staffordshire County Council Minerals Plan<br><br>(Staffordshire County Council, 2017)                                        | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | The objectives of the mineral plan are to locate mineral sites where adverse impacts are avoided or minimised on local communities and the environment and any benefits are maximised. It seeks to ensure that mineral sites operate to high environmental standards by avoiding, reducing or mitigating as far as possible the adverse impacts on local communities and the environment close to mineral operations and along the routes used to transport minerals. Captains Barn Farm is located in the SCCLP area but is already operational. It is not located near the Midland Meres and Mosses Phase 2 Ramsar Site. There will not be an in-combination effect upon the Midland Meres and Mosses Phase 2 Ramsar Site. |
| Staffordshire and Stoke-on-Trent Joint Waste Plan<br><br>(Staffordshire County Council and Stoke-on-Trent City Council, 2013) | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | The waste plan does not allocate any sites for the development of new waste facilities, and its policies are not linked to specific locations. Facilities for waste are located closer to Stoke-on -rent than the Midland Meres and Mosses Phase 2 Ramsar Site. There will not be an in-combination effect upon the Midland Meres and Mosses Phase 2 Ramsar Site.                                                                                                                                                                                                                                                                                                                                                            |

| Plan or Project                                                                                                   | Possible Adverse Effect on Site Integrity In-Combination               | Justification                                                                                                                                                                                                                                                                                                                                                                         |
|-------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Staffordshire Moorlands District Council Local Plan<br><br>(Staffordshire Moorlands District Council, 2018; 2020) | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | No pathways identified to the Midland Meres and Mosses Phase 2 Ramsar Site within the Staffordshire Moorlands District Council Local Plan. There will not be an in-combination effect upon the Midland Meres and Mosses Phase 2 Ramsar Site.                                                                                                                                          |
| United Utilities Water Resource Management Plan<br><br>(United Utilities Water, 2024a; 2024b)                     | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | No pathways identified to the Midland Meres and Mosses Phase 2 Ramsar Site within the Water Resource Management Plan. The only LSEs identified in the Water Resource Management Plan are related to the Mersey Catchment. The SCCLP is incapable of affecting the Mersey Catchment. There will not be an in-combination effect upon the Midland Meres and Mosses Phase 2 Ramsar Site. |

### **5.4.1 Summary of AA In-Combination Assessment**

Upon reviewing the feature-pressure interactions that have been assessed in-combination with other plans and projects, it is considered that the SCCLP will not have an adverse effect on site integrity in-combination on the Midland Meres and Mosses Phase 2 Ramsar Site. The rationale is that despite other plans and projects being identified, there are no pathways for an in combination adverse effect on site integrity.

## 6.0 INTEGRITY TEST

The ‘integrity’ of a site is considered to be the quality or condition of being whole or complete; or in a dynamic ecological context, as having resilience and an ability to evolve in ways that are favourable to conservation. A site can be described as having a high degree of integrity where the inherent potential for meeting site conservation objectives is realised, the capacity for self-repair and self-renewal under dynamic conditions is maintained, and a minimum of external management support is required (DTA Publications, 2025).

The ‘integrity of a site’ relates to the site’s conservation objectives. Taking each qualifying feature in turn, if the conservation objectives for a feature will be undermined, site integrity is necessarily adversely affected. On the contrary, site integrity cannot be considered to be adversely affected if the findings of an appropriate assessment demonstrate that the conservation objectives will not be undermined alone or in combination with other plans or projects. The test is whether there is ‘reasonable’ scientific doubt rather than an absolute certainty. It is not possible to demonstrate, nor is it necessary to show, an absolute guarantee that there will not be an adverse effect on site integrity (DTA Publications, 2025).

Even where a Habitats site’s qualifying features are not currently at favourable conservation status, and conservation objective targets are to ‘restore’, projects can go ahead if they either provide a reduction in the relevant pressure or they do not contribute toward it. In such cases there is no adverse effect on integrity even if the proposals are not actually contributing to an improvement; they are not making the situation worse, nor are they impeding the achievement of the conservation objectives which are being or will be delivered under Article 6(1) or 6(2).

The only Habitats site identified within 10km of the SCCLP area was the Midland Meres and Mosses Phase 2 Ramsar Site. Natural England does not produce conservation objectives for Ramsar sites. The objectives for West Midland Mosses SAC (Natural England, 2018) have been used as a suitable proxy.

The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the Favourable Conservation Status of its qualifying features, by maintaining or restoring:

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

It is further noted that the most recent condition assessments of the underpinning Oakhanger Moss SSSI and Black Firs and Cranberry Bog SSSI indicate that the features are in unfavourable condition (Natural England, 2012b; 2021b). The condition assessments refer to water pollution, and failure of management measures intended to maintain water levels are the factors determining the unfavourable condition.

Notwithstanding the absence of mitigation measures, the AA in Section 5 demonstrates that the qualifying features will remain a viable component of the Habitats site. The SCCLP will not impede the achievement of the conservation objectives which are being, or will be, delivered under Article 6(1) or 6(2) of the Habitats Directive. As a result, there will be no adverse effect on site integrity from the SCCLP.



## 7.0 CONCLUSION

This is a record of the Stage 1 LSE Screening and Stage 2 AA required by Regulation 105 of the Habitats Regulations and undertaken by Tetra Tech in respect of the SCCLP.

The Stage 1 LSE assessment concluded that the SCCLP could have a LSE on the Midland Meres and Mosses Phase 2 Ramsar Site from air pollution deposition and recreational disturbance that could materialise due to policies:

- E1 Quantity of Employment Development;
- E2 Distribution of Employment Development;
- H1 Housing numbers;
- H2 Housing Distribution;
- CCER5 Minerals; and
- H9 Gypsy and Traveller and Travelling Showpeople Accommodation

A Stage 2 AA has been undertaken regarding the implications of the SCCLP in consideration of the applicable conservation objectives. It is considered that the SCCLP does not have the capacity of causing an adverse effect on site integrity either alone or in-combination with other plans or projects. There will be no reduction on the condition of the qualifying features. The conservation objectives to maintain (or restore) each feature in favourable condition will not be impacted. The SCCLP will not impede the achievement of the conservation objectives which are being, or will be, delivered under Article 6(1) or 6(2) of the Habitats Directive.

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## FIGURES

**Figure 1: Local Plan Area**

**Figure 2: Habitats sites within 10km of Local Plan Area**

**Figure 3a: Midland Meres and Mosses Phase 1 Ramsar**

**Figure 3b: Midland Meres and Mosses Phase 2 Ramsar**

**Figures 4a – 4b: Air Pollution Deposition Zone of Influence**















## APPENDIX A: REPORT CONDITIONS

This Report has been prepared using reasonable skill and care for the sole benefit of Stoke-on-Trent City Council (“the Client”) for the proposed uses stated in the report by Tetra Tech Limited (“Tetra Tech”). Tetra Tech exclude all liability for any other uses and to any other party. The report must not be relied on or reproduced in whole or in part by any other party without the copyright holder’s permission.

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The report refers, within the limitations stated, to the environment of the SCCLP in the context of the surrounding area at the time of the assessment. Environmental conditions can vary and no warranty is given as to the possibility of changes in the environment of the SCCLP and surrounding area at differing times. No investigative method can eliminate the possibility of obtaining partially imprecise, incomplete or not fully representative information. Any monitoring or survey work undertaken as part of the commission will have been subject to limitations, including for example timescale, seasonal and weather-related conditions. Actual environmental conditions are typically more complex and variable than the investigative, predictive and modelling approaches indicate in practice, and the output of such approaches cannot be relied upon as a comprehensive or accurate indicator of future conditions. The “shelf life” of the Report will be determined by a number of factors including; its original purpose, the Client’s instructions, passage of time, advances in technology and techniques, changes in legislation etc. and therefore may require future re-assessment.

The whole of the report must be read as other sections of the report may contain information which puts into context the findings in any executive summary.

Tetra Tech reserves the right to share this Report and any related materials, surveys, drawings and/or documents at any time with the relevant Local Ecological Records Centre (LERC), any relevant statutory body or any equivalent organisation as Tetra Tech may reasonably require from time-to-time.

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