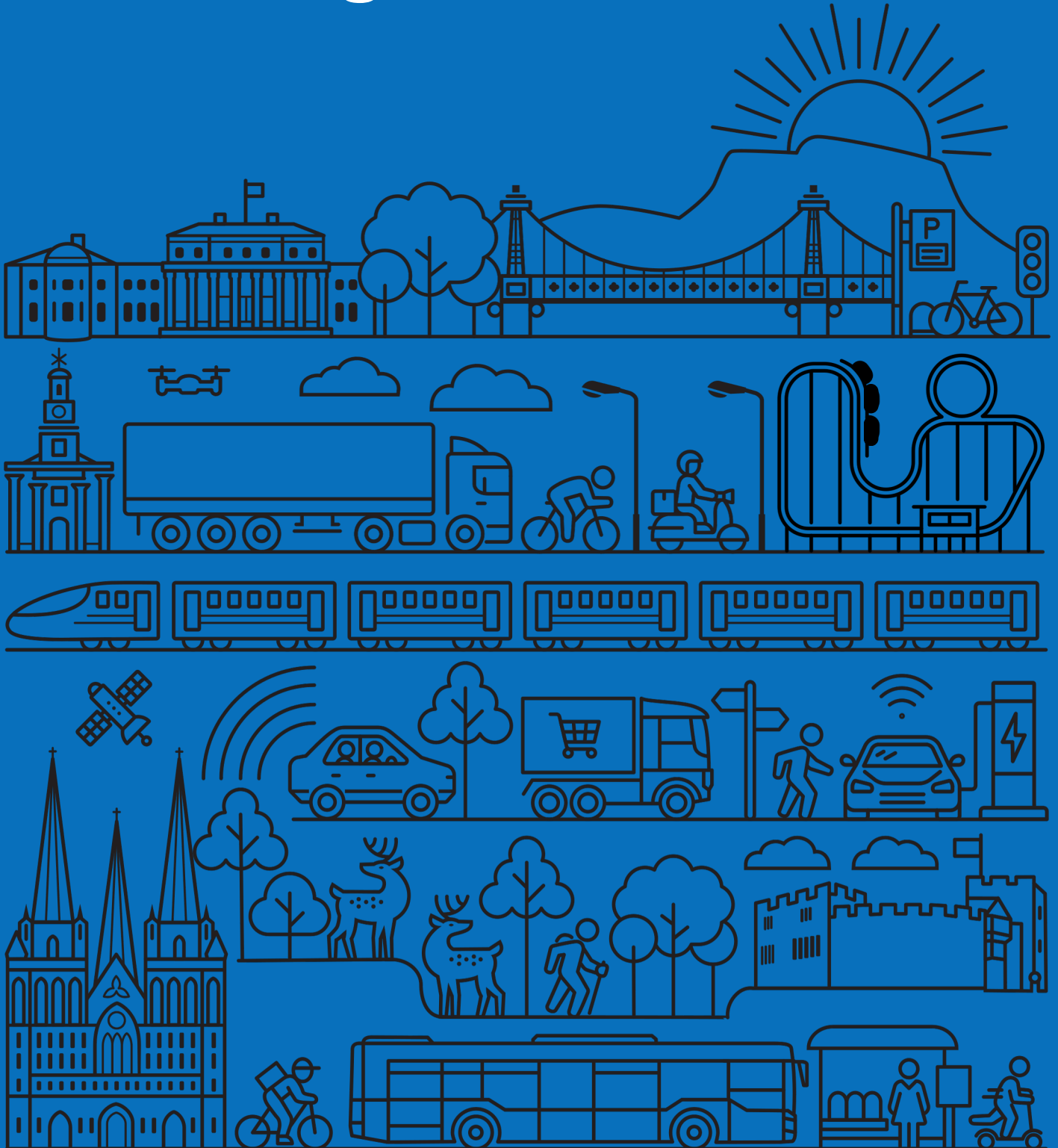


STAFFORDSHIRE

Draft Local Transport Plan

2025

Habitat Regulations Assessment



Staffordshire
County Council

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1. Introduction

1.1 Preamble

This document is the Habitats Regulations Assessment (HRA) for Staffordshire's draft Local Transport Plan, 2025 (LTP). The LTP focuses on delivering schemes that have a sound business case, add value, contribute to social good, and protect the natural environment, the LTP contains five delivery principles:

1. Enable People to Make the Right Travel Choice
2. Create Vibrant, Prosperous and Attractive Places
3. Create Healthy, Safe and Inclusive Communities
4. Enhance the Natural Environment
5. Adopt an Infrastructure-light Approach

The HRA shows how consideration was given to ensuring that the LTP will not have any likely significant effects or adverse effects (either alone or in combination with other projects and plans) on the integrity of sites that are designated at a European level because of their international importance for nature conservation.

From the outset, it should be noted that the LTP is not directly connected with, or necessary to, the conservation of any designated European site. It is also a strategic document that has few references to locational specific schemes.

1.2 Background to the assessment

The requirement to carry out a HRA is set out in Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulation). It states that a HRA must be carried out for all plans and projects that may have a likely significant effect on a European site, and are not directly connected with, or necessary to, the management of a European site.

Staffordshire has 13 sites that are designated at a European level because of their international importance for nature conservation. They comprise:

- Nine sites that are designated as part of the Natura 2000 network of European sites, representing areas of the highest value for natural habitats and species at a European level. These are:
 - Cannock Chase, Special Area of Conservation (SAC)
 - Cannock Extension Canal, SAC
 - Motte Meadows, SAC
 - Pasturefields Salt Marsh, SAC
 - Peak District Dales (Part), SAC
 - River Mease (Part), SAC
 - South Pennine Moors (Part), SAC

- West Midlands Mosses (Chartley Moss), SAC
- Peak District Moors (Part), Special Protection Area (SPA)

SACs support rare, endangered or vulnerable natural habitats and species of plants or animals, whereas SPAs support significant numbers of wild birds and their habitats. Some areas of the county, such as the Peak District National Park, are both SACs and SPAs.

- Four Ramsar sites, which are wetland habitats, designated under the inter-governmental Ramsar agreement. These have very similar protection to Natura 2000 sites and in Staffordshire, they include:
 - Midlands Meres and Mosses phase I (Betley Mere), Ramsar
 - Midlands Mere and Mosses phase II (Aqualate Mere), Ramsar
 - Midlands Mere and Mosses phase II (Cop Mere), Ramsar
 - Midlands Mere and Mosses phase II (Black Firs and Cranberry Bog), Ramsar

A HRA is also required, as a matter of UK Government policy, for potential SPAs, possible SACs, candidate SACs, and proposed Ramsar sites. In Staffordshire there are no such sites (Magic Map, accessed 19/05/25.)

1.3 Stages of the HRA process

There are four stages to the HRA process. These can be summarised as:

1. **Screening:** To test whether a plan or project either alone or in combination with other plans and projects is likely to have a significant effect on a European site.
2. **Appropriate Assessment:** To determine whether, in view of a European Site's conservation objectives, the plan (either alone or in combination with other projects and plans) would have an adverse effect on the integrity of the site with respect to the site structure, function and conservation objectives.
3. **Assessment of alternative solutions:** Where a plan is assessed as having an adverse impact (or risk of this) on the integrity of a European site, there should be an examination of alternatives (e.g. alternative locations and scale of arising development).
4. **Assessment where no alternative solutions exist and where adverse impacts remain:** In exceptional circumstances only (e.g. where there are imperative reasons of overriding public interest), compensatory measures must be used to offset the negative impacts.

The strategic nature of the LTP means that the information needed to undertake a detailed Appropriate Assessment is limited as there are no specific scheme details. Therefore, we have adopted a level of assessment that is commensurate with the level of detail provided in the LTP, which is deemed to be stage 1 (Screening) only.

2. The new LTP and its potential impacts

2.1 Overview of the draft LTP

It is vital that the new LTP is developed and delivered in a way which:

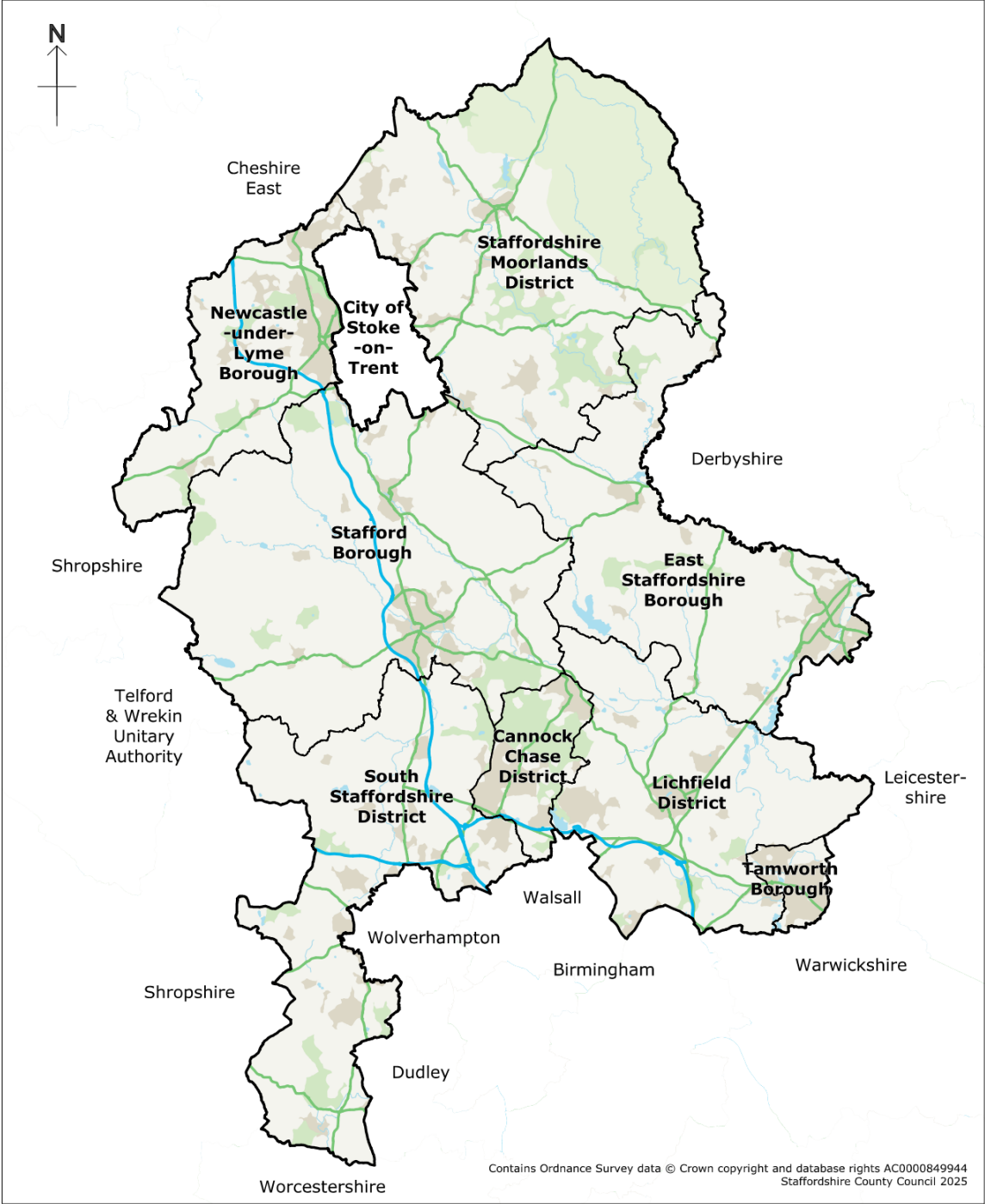
- Protects and enhances Staffordshire's natural environment and cultural heritage.
- Promotes the health and quality of life of Staffordshire's residents.
- Allows as many different people as possible, the same opportunities for accessing the facilities and services they require.
- Promotes continuous and strong economic growth.

The LTP contains ambitious objectives that require us receiving our funding asks of National Government and gaining the necessary commitments from key stakeholders. The LTP requires a significant step-change in how we think about, plan and deliver transport across the county.

The LTP, which covers the administrative area of the County Council (see Figure 1) and aims to create:

"An integrated and efficient transport system that delivers economic prosperity, creates healthy and safe communities, and improves the environment."

Figure 1: Staffordshire LTP Area



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Staffordshire County Council, 24/04/2025.
Aerial photography: © Bluesky International Limited and Getmapping 2025.

Scale: 1:400000

The LTP provides an opportunity to develop and enhance new, cleaner, greener ways of working and travelling. To achieve this ambition, we have developed five delivery principles, which ensure the LTP delivers schemes that have a sound business case, add value, contribute to social good, and protect the natural environment. The principles are:

1. Enable people to choose how, when and if they travel

To help our economy to prosper and our communities to be healthier and happier, more and better travel choices need to be available to our residents and businesses. Schemes must cater for a range of travel options, including but not limited to, car-based travel, walking, cycling, and public transport. Similarly, enhancing broadband and mobile services will provide an alternative to physical travel. For many residents, digital connectivity can support inclusivity and social mobility, and for businesses, it can broaden access to markets and improve productivity.

2. Create Vibrant, Prosperous and Attractive Places

Schemes will support the prosperity of town and village centres, making them high-quality, attractive, multi-functional places. To help achieve this, there needs to be greater integration between land-use and transport planning. This will help to create more accessible and vibrant communities, boost economic growth, and ensure inclusive access to jobs, services and amenities.

3. Improve Health, Wellbeing, and Community Cohesion

The highway network plays a vital role in our society. Schemes must help address health-related issues, improve connectivity, and be accessible to all. Where possible, road space will be reallocated in favour of active travel modes or to create new community spaces.

4. Enhance the Natural Environment

We are the custodians of a highway network that includes 5,762km of road verges and almost half a million trees. Schemes will protect biodiversity, and wherever possible, secure net species and habitat gain. However, this will not be at the expense of ensuring safe roads.

5. Recognise Whole Life Impacts

During scheme design, every opportunity will be taken to re-use, repair, and re-purpose assets, thereby maximising whole life impacts. Existing assets, such as guard rails and signage, will not automatically be replaced during maintenance work. Instead, each asset will be assessed with regards to its relevance. Where a new asset is required, its whole life impact will be considered.

Key to delivering the LTP's vision will be a focus on innovation, technology and digitisation, as well as spatial planning. As such, the LTP's strategic objectives have been identified as:

- Deliver a whole systems approach to transport and road management that **grows the economy**.
- Deliver safe, well maintained local roads, footways and cycleways that create a **sense of place and healthy communities**.
- Improve **physical and virtual connectivity**, whilst addressing inequalities.
- Improve air quality and **protect the natural environment**.

The LTP has been written so that it aligns to several national and local¹ plans and strategies, including:

- Plan for Change, Milestones for mission-led government, December 2024
- Decarbonising Transport a Better, Greener Britain, 2021 - 2050
- Staffordshire County Council Strategic Plan 2022-26
- Staffordshire Communities Strategy, 2024
- Staffordshire Economic Strategy, 2023-30
- Staffordshire Natural Environment Strategy, 2024-2026
- Cannock Chase National Landscape (formerly AONB) Management Plan, 2025-2030
- Peak District National Park Management Plan, 2023 - 2028

The LTP will also play an important role in supporting and enabling delivery of the housing and economic development, required to meet the future needs of the county as set out in the adopted and emerging borough and district local plans.

2.2 Potential negative effects of highways and transport on European Sites

Even though the draft LTP contains few references to locational specific schemes, future, and yet unknown, LTP schemes might have the potential to impact on European Sites. The type of impacts that transport schemes could have on nature conservation, include:

Habitat Fragmentation - Roads are a major contributor to habitat fragmentation because they can divide large landscapes into smaller areas and convert interior habitat into edge habitat. Except for Betley Mere Water Body RAMSAR sites, all the county's SACs, SPAs and Ramsar sites have roads running through them or that lie near to their boundary.

Habitat loss - When the roads running through European Sites require maintenance and improvement works, this could negatively impact on the Site's fauna and flora. Directly, works can lead to habitat loss and fragmentation, and changes to hydrology systems. Indirectly, works next to Sites can lead to increased noise and vibration, which can impact on the breeding, foraging, and migration patterns of certain species.

¹ Please note that the County Council plans and strategies were prepared by the previous administration.

Air Pollution – Air Quality Management Areas (AQMA) are specific sites designated by district and borough councils where national air quality objectives are not being met or are likely to be exceeded. In Staffordshire, all eight AQMA have been designated due to exceedances caused by tailpipe emissions.

The distance tailpipe emissions travel depends on factors like wind, atmospheric conditions, and the types of pollutants released. Generally, tailpipe emissions spread out and disperse as they travel, with higher concentrations closer to the source. The AQMA on the A5 (Churchbridge to Walsall Boundary) in Cannock is approximately 400m away from the Cannock Extension Canal (SAC); all other AQMA are at least 2.5km away from a European Site.

All the SACs, SPAs and Ramsar sites (except the Betley Mere Water Body RAMSAR sites) have roads running through them or lie within 200m of a road. On average, particulate matter (PM) concentrations typically drop to near background levels within 200m of a road, especially on the upwind side. However, it is noted that on the downwind side, it may take 300m – 500m, for concentrations to reach background levels. As the specific distance depends on factors like wind direction, road type, and traffic volume, we have taken the average distance (i.e. 200m) to establish impact.

Highway Runoff - Transport contributes to water pollution primarily through contaminants washed from road surfaces and parking areas. The main pollutants include, fuel leakages, motor oil, suspended soils, heavy metals, road salting run-off and herbicides used to control grass verges. The cumulative impact of such pollutants can have a significant detrimental impact on water habitats and dependent species.

Whilst three of the county's four RAMSAR sites have roads running through them or nearby, recent data from the Environmental Agency shows that all four RAMSA sites have moderate ecological status.

Noise Pollution - Traffic noise can negatively impact European Sites by causing stress and potentially affecting the health, behaviour, and reproductive success of wildlife, including birds, frogs, and other species.

Exposure to traffic noise can disrupt communication, reduce breeding success, and negatively impact immune function. Traffic noise generally decreases as distance from the road increases, but not linearly. The reduction is typically around 3dB for every doubling of distance. However, this can vary based on factors like terrain, the types of vehicles, and the speed of traffic, barriers, etc.

The Department of the Environment, Food and Rural Affairs (Defra) has published strategic noise map data that gives a snapshot of the estimated noise from road and rail sources across England in 2022. Potential issues identified in Staffordshire where road noise exceeds 68db, include sections of the M6, A5, A38, M54, A34, A50, A500, A449, A5195 (Burntwood), A51, A460, and the A5127. Some of the county's European Sites are within close proximity to roads that this threshold. For example, Cannock Extension Canal (SAC) is approximately 30m from the A5 in Norton Canes.

Light Pollution - Has the potential to disrupt the natural processes of fauna and flora. Light pollution can interfere with natural rhythms, including sleep patterns, reproduction, and migration, impacting animals active at night and at dusk. It can cause stress and increase mortality rates in certain species. Many species avoid areas with excessive light, which can alter their habitat use and impact species composition.

Visual Impact - The nature and scale of a highway and works to maintain it as well as its proximity to a European Site are important considerations. Visual impact can be permanent or temporary. It is important to consider the visual impact from both the nearby and distant public viewpoints.

Roadkill - Roadkill is a major source of mortality for some wildlife populations, particularly those of badgers, hedgehogs, and deer. On Cannock Chase SAC, deer collisions often peak in May, and are high from October through January, coinciding with their breeding and dispersal seasons. In 2024, the County Council's Ranger Service were called out over 150 times to deal with animals (predominantly deer) that were struck by vehicles on Cannock Chase. The actual number is likely to be much larger. Where animals manage to get themselves off the highway once hit, they often die of their injuries later.

At a scheme level and through all phases of scheme development, highway engineers work closely with the Council's Ecologist and Archaeologist, as well as partner organisations (e.g. Peak District Nature Park Authority and the Cannock Chase SAC Partnership), to consider the impact on nature conservation. The types of assessment that are appropriate for the scale and nature of the scheme will be identified and evaluated during every stage. This will allow for the full consideration of required statutory processes as necessary.

3. Methodology

3.1 Identification of European Sites

This report has been produced following the Government's guidance on the HRA process, entitled Habitats Regulations Assessments: Protecting a European Site.

An initial review of the draft LTP has looked at the geographic extent of influence of any impacts that could arise as a result of the LTP and considered which European Sites should be included within the assessment. All sites where potential direct, indirect and in-combination impacts could reasonably occur, were screened for inclusion. As an initial baseline, a buffer of 15km from the Council's administrative boundary was established. Beyond 15km, the number of sites increases dramatically. However, as the LTP's potential impact dissipates with distance, it was deemed disproportionate to include any sites beyond 15km.

A total of 23 European Sites have been identified. These comprise:

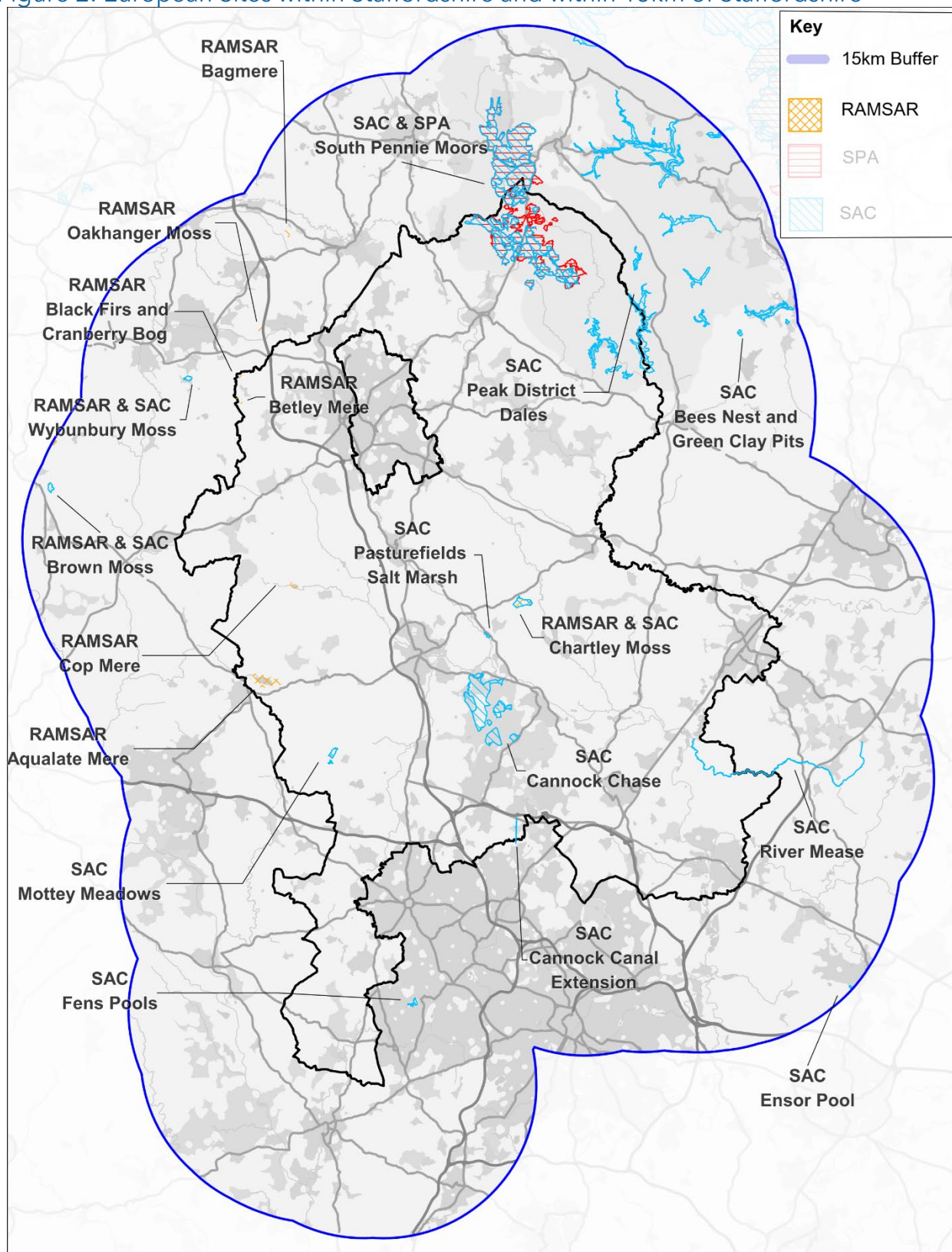
- Fourteen sites are wholly or partly in Staffordshire. These include 8 SACs; 5 RAMSARs; and 1 SPA. Two sites have two designations - Chartley Moss is both a SAC and a RAMSAR; and South Pennine Moors is both a SCA and a SPA. Seven sites are wholly within Staffordshire and 7 are cross boundary.
- Nine sites are outside of the county but within 15km of the boundary. These are 5 SACs and 4 RAMSARs. Two sites have two designations - Wybunbury Moss and Brown Moss are both SACs and RAMSARs.

There are no cSACs, pSPAs or pRamsar sites currently present in the assessment area (Magic Map, accessed 05/06/25). Table 1 lists the local planning authorities where each site is located, and Figure 2 shows their specific locations.

Table 1: European Sites within the LTP and its Buffer Area

European Sites			Local Planning Authority
Within Staffordshire or Cross Boundary			
SAC	1	Cannock Chase	Stafford/Cannock Chase
	2	Cannock Extension Canal	Cannock Chase/Walsall
	3	Motley Meadows	South Staffs
	4	Pasturefields Salt Marsh	Stafford
	5	West Midlands Mosses (Chartley Moss)	Stafford
	6	Peak District Dales	Moorlands/Derbyshire Dales
	7	South Pennine Moors	Moorlands/High Peak
	8	River Mease	Tamworth/ Hinckley & Bosworth
RAMSAR	9	Midlands Meres and Mosses phase I (Betley Mere)	Newcastle/Cheshire East
	10	Midlands Mere and Mosses phase II (Aqualate Mere)	Stafford
	11	Midlands Mere and Mosses phase II (Cop Mere)	Stafford
	12	Midlands Mere and Mosses phase II (Black Firs and Cranberry Bog)	Newcastle
	13	West Midlands Mosses (Chartley Moss)	Stafford
SPA	14	Peak District Moors (South Pennine Moors Phase 1) (Part)	Moorlands/High Peak
Within 15km of Staffordshire			
SAC	15	Brown Moss	Shropshire
	16	Fens Pools	Dudley
	17	West Midlands Mosses (Wybunbury Moss)	Cheshire East
	18	Bees Nest and Green Clay Pits	Derbyshire
	19	Ensors Pool	Nuneaton and Bedworth
RAMSAR	20	Midlands Meres and Mosses phase I (Brown Moss)	Shropshire
	21	Midlands Meres and Mosses phase I (Bagmere)	Cheshire East
	22	Midlands Meres and Mosses phase II (Oakhanger Moss)	Cheshire East
	23	Midlands Meres and Mosses phase I (Wybunbury Moss)	Cheshire East

Figure 2: European Sites within Staffordshire and within 15km of Staffordshire



4. Stage 1: Screening

4.1 Screening of the LTP's impact on European Sites

The purpose of the screening stage is to identify all aspects of the LTP that would:

1. Have no effect on a European Site, enabling them to be eliminated from further consideration.
2. Not have a significant effect on a European Site either alone or in combination with other aspects of the LTP or other plans or projects, meaning an 'appropriate assessment' is not required.
3. Likely have a significant effect on a European Site, either alone or in combination with other plans or projects, meaning an 'appropriate assessment' is required.

An effect is deemed 'significant' in this context if it could undermine the site's conservation objectives. The assessment of this risk has been made in the light of certain factors, such as the characteristics and specific environmental conditions of the European Site in question.

Table 2 summarises each sites special interest and potential vulnerabilities, along with any potential pathways by which the LTP might impact on them. It found that the implementation of the LTP could potentially and indirectly impact on some European Sites, primarily as a result of nitrate deposition and highway run-off. However, the risk and degree of impact would be insufficient in both respects to necessitate an 'appropriate assessment'.

Table 2: European Sites and their Sensitivity to Highway Use, Management, Maintenance and Improvements

Sensitivity					
					Likely have a significant effect, requiring an 'appropriate assessment' Sensitive
					Potential impact but not sufficient to require an 'appropriate assessment'
					No effect and no pathway
European Site	No.	Reason for Designation	Site Vulnerability related to the LTP	Potential Pathway	Sensitivity
Cannock Chase SAC	1	European dry heaths Northern Atlantic wet heaths with <i>Erica tetralix</i>	Recreational pressure Air pollution	Yes	<p>Nitrate deposition is known to affect habitats up to 200m away from the road network; over 30% of the Cannock Chase SAC falls within this parameter, with some roads being the main route between Cannock, Rugeley and Stafford. There is evidence of nitrate deposition happening in this location.</p> <p>Vehicles are becoming less polluting, meaning the level of nitrate deposition from road vehicles is reducing. Efforts to manage road traffic across the SAC and promote visitor access remains important.</p>
Cannock Extension Canal SAC	2	Floating water-plantain <i>Luronium natans</i>	Highway run-off Recreational pressure	Yes	<p>Nitrate deposition is known to affect habitats up to 200m away from the road network. Over 30% of the Cannock Extension Canal SAC falls within this parameter, including the B4154, connecting Norton Canes to Pelsall in the West Midlands. However, there is no evidence of this happening in this location.</p>

					Vehicles are becoming less polluting, meaning that the level of nitrate deposition from road vehicles is reducing. Efforts to manage road traffic and promote access to the SAC by active and public transport remain important, along with managing highway run off.
Motley Meadows SAC	3	Lowland hay meadows (<i>Alopecurus pratensis</i> , <i>Sanguisorba officinalis</i>)	Air pollution Highway run-off	No	Although Motley Meadows is approximately 800m from a category C road - Marston Road. Any highway run off or nitrate deposition would have dissipated before it reaches the site.
Pasturefields Salt Marsh SAC	4	Inland salt meadows The only known remaining example in the UK of a natural salt spring with inland saltmarsh vegetation	Air pollution Recreational pressure	Yes	Nitrate deposition is known to affect habitats up to 200m away from the road network; over 30% of the Salt Marsh SAC falls within this parameter, which includes the A51 between Hixon and Great Haywood. However, there is no evidence of this happening in this location. Vehicles are becoming less polluting, meaning the level of nitrate deposition from road vehicles is reducing. Efforts to manage road traffic across the SAC and promote active and public transport whilst at the SAC remains important.
West Midlands Mosses (Chartley Moss)	5	Natural dystrophic lakes and ponds Transition mires and quaking bogs	Highway run-off	No	The A518, connecting Stafford and Uttoxeter, is located 200m from the site. Therefore, any highway run off that could have impacted on the SAC would have dissipated before it reaches the site.
Peak District Dales SAC	6	Alkaline fens. Calaminarian grasslands	Air pollution	Yes	Nitrate deposition is known to affect habitats up to 200m away from the road network; over 30%

		Calcareous and calcschist. Calcareous rocky slopes with chasmophytic vegetation. European dry heaths. Semi-natural dry grasslands and scrubland facies: on calcareous substrates. Tilio-Acerion forests of slopes, screes and ravines. Brook lamprey <i>Lampetra planeri</i> Bullhead <i>Cottus gobio</i> White-clawed crayfish <i>Austropotamobius pallipes</i>	Highway run-off		of the Peak District Dales SAC falls within this parameter, with some roads being the main routes, linking Buxton, Bakewell and Ashbourne. There is no evidence of this happening in this location. Vehicles are becoming less polluting, meaning that the level of nitrate deposition from road vehicles is reducing. Efforts to manage road traffic across the SAC and promote active and public transport to the SAC remains important.
South Pennine Moors SAC	7	Blanket bogs, European dry heaths, Northern Atlantic wet heaths with <i>Erica tetralix</i> . (Wet heathland with cross-leaved heath), Old sessile oak woods with Ilex and Blechnum in the British Isles, and transition mires and quaking bogs.	Air pollution Highway run-off	No	There are no roads near to the SAC.
River Mease SAC	8	Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and	Air pollution Highway run-off	No	There are no roads near to the SAC.

		Callitricho-Batrachion vegetation. White-clawed crayfish <i>Austropotamobius pallipes</i> , Spined loach <i>Cobitis taenia</i> , Bullhead <i>Cottus gobio</i> , and Otter <i>Lutra lutra</i>			
Betley Mere Midland Meres and Mosses Phase 1 Ramsar	9	Open water and peatland	Air pollution Highway run-off	No	The A531 is close to the site (350m). However, its distance is deemed too far away for highway run off or nitrate deposition to have an impact.
Aqualate Mere Midland Meres and Mosses Phase 2 Ramsar	10	Extensive reedbeds	Air pollution Highway run-off	No	The A41 and A518 are close to the site (1km and 750m respectively). However, their distance is deemed too far away for highway run off or nitrate deposition to have an impact.
Cop Mere Meres and Mosses Phase 2 Ramsar	11	Natural dystrophic lakes and ponds, Transition mires and quaking bogs	Air pollution Highway run-off	No	All roads within or adjacent to the site are minor, meaning negligible nitrate deposition and highway run off.
Black Firs and Cranberry Bog Midland Meres and Mosses Phase 2 Ramsar	12	Open water and peatland sites	Air pollution Highway run-off	No	The A531 is close to the site. However, its distance is deemed too far away for Staffordshire-originated highway run off or nitrate deposition to have an impact.
South Pennine Moors SPA	13	Merlin (<i>Falco columbarius</i>) Short-eared owl (<i>Asio flammeus</i>) Golden plover (<i>Pluvialis apricaria</i>)	Roadkill Noise and light pollution	Yes	As above, plus additional minor highways. There is no evidence of species being affected by being in the vicinity of highways.

			Habitat fragmentation Air pollution Highway run-off		
Peak District Dales (SAC) (Part)	14	Alkaline fens, Calaminarian grasslands of the Violetalia calaminariae, Calcareous and calcshist screes of the montane to alpine levels (Thlaspietea rotundifolii), Calcareous rocky slopes with chasmophytic vegetation, European dry heaths, Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia), and Tilio-Acerion forests of slopes, screes and ravines. Brook lamprey <i>Lampetra planeri</i> , Bullhead <i>Cottus gobio</i> , and White-clawed crayfish <i>Austropotamobius pallipes</i>	Roadkill Noise and light pollution Habitat fragmentation Air pollution Highway run-off	No	Two minor roads are close to the site. However, their distance is deemed too far away for Staffordshire-originated highway run off or nitrate deposition to have an impact.
River Mease SAC	15	Water courses of plain to montane levels with the	Air Pollution	No	Nitrate deposition is known to affect habitats up to 200m away from the road network; there are

		<i>Ranunculus fluitans</i> and <i>Callitriche-Batrachium</i> vegetation. White-clawed crayfish <i>Austropotamobius</i> <i>pallipes</i> Spined loach <i>Cobitis</i> <i>taenia</i> Bullhead <i>Cottus</i> <i>gobio</i> Otter <i>Lutra lutra</i>	Highway run-off		<p>approximately 8.5km of road in Staffordshire that fall in the 200m catchment of the River Mease SAC, although all the roads are category C and U. There is no evidence of this happening in this location.</p> <p>Vehicles are becoming less polluting, meaning that the level of nitrate deposition from road vehicles is reducing. Efforts to manage road traffic across the SAC and promote active and public transport to the SAC remains important.</p> <p>The impact of highway run-off is deemed insignificant.</p>
South Pennine Moors SAC	16	Northern Atlantic wet heaths with <i>Erica tetralix</i> ; European dry heaths Blanket bogs* Transition mires and quaking bogs; Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i>	Air pollution Highway run-off	No	<p>Nitrate deposition is known to affect habitats up to 200m away from the road network; approximately 55km of road falls within the 200m catchment of the South Pennine Moors. These include all road classifications, from category A (e.g. Hazelwood Road) to category U (e.g. Stoneyfold Lane). However, there is no evidence of this happening in this location.</p> <p>Vehicles are becoming less polluting, meaning the level of nitrate deposition from road vehicles is reducing. Efforts to manage road traffic across the SAC and promote active and public transport to the SAC remains important.</p>

					The impact of highway run-off is deemed insignificant.
Brown Moss SAC	17	Floating water-plantain <i>Luronium natans</i>	Highway run-off	No	All roads near the site are minor and too far for Staffordshire originated highway run-off to have an impact.
Fens Pools SAC	18	Great crested newt population	Roadkill Air pollution Highway run-off	No	The A4101 and A461 are close to the site as well as smaller local residential roads. However, their distance is deemed too far away for highway run off or nitrate deposition to have an impact.
West Midlands Mosses (Wybunbury Moss) SAC	19	Open water and peatland	Air pollution Highway run-off	No	All Staffordshire roads are too far from the site to have an impact.
Bees Nest and Green Clay Pits SAC	20	Semi-natural dry grasslands and scrubland on calcareous substrates (important orchid sites) Great Crested Newt population	Air pollution Highway run-off	No	Nitrate deposition is known to affect habitats up to 200m away from the road network. Only minor road falls within this parameter. There is no evidence that this site is affected by nitrate deposition. Vehicles are becoming less polluting, meaning the level of nitrate deposition from road vehicles is reducing. Efforts to manage road traffic across the SAC and promote active and public transport to the SAC remains important, along with managing highway run off.
Ensors Pool SAC	21	White-clawed crayfish population	Air pollution Highway run-off	No	The A444 and B4112 are close to the site as well as smaller local residential roads. However, their distance is deemed too far away for

					highway run off or nitrate deposition to have an impact.
Peak District Moors (South Pennine Moors Phase 1) (Part)	22	Alkaline fens. Calaminarian grasslands Calcareous and calcschist. Calcareous rocky slopes with chasmophytic vegetation. European dry heaths. Semi-natural dry grasslands and scrubland facies: on calcareous substrates. Tilio-Acerion forests of slopes, screes and ravines. Brook lamprey <i>Lampetra planeri</i> Bullhead <i>Cottus gobio</i> White-clawed crayfish <i>Austropotamobius pallipes</i>	Air pollution Highway run-off	No	Nitrate deposition is known to affect habitats up to 200m away from the road network; over 30% of the Peak District Dales SAC falls within this parameter, with some roads being the main routes, linking Buxton, Bakewell and Ashbourne. There is no evidence of this happening in this location. Vehicles are becoming less polluting, meaning that the level of nitrate deposition from road vehicles is reducing. Efforts to manage road traffic across the SAC and promote active and public transport to the SAC remains important.
Midlands Meres and Mosses phase I (Brown Moss)	23	Floating water-plantain <i>Luronium natans</i>	Highway run-off	No	All roads near the site are minor and too far for Staffordshire originated highway run-off to have an impact.
Midlands Meres and Mosses phase I (Bagmere)	24	Pearl-bordered fritillary butterfly, which feeds off marsh violet <i>Viola palustris</i> and common dog-violet <i>V. riviniana</i>	Air pollution Highway run-off	No	All roads near the site are minor and too far for Staffordshire originated highway run-off to have an impact.

Midlands Meres and Mosses phase II (Oakhanger Moss)	25	Natural dystrophic lakes and ponds, Transition mires and quaking bogs	Air pollution Highway run-off	No	Most of the impacts were from national traffic growth along the M6 rather than being attributable to local traffic growth, so no adverse effect on site integrity as a result of traffic on Staffordshire roads.
Midlands Meres and Mosses phase I (Wybunbury Moss)	26	Open water and peatland	Air pollution Highway run-off	No	All Staffordshire roads are too far from the site to have an impact.

4.2 Screening of LTP Theme Objectives

To ensure that everything is being done to identify and rule out any adverse impact of the LTP on European sites in the future, the LTP objectives and potential actions have also been examined. Measures have been put in place to monitor the sites for any future impacts resulting from LTP delivery. The results of this exercise are set out in Table 3.

Table 3: Screening of LTP Theme Objectives and Actions

LTP Theme Objectives	Summary of Proposed Actions	Screening Opinion	Next stage
1: Ensure multi-modal connectivity for all, to, from and within rail stations 2: Improve rail passenger and freight services 3: Deliver high-quality bus services that are reliable, accessible and easy to use 4: Provide other public travel options where frequent bus services are not available	<ul style="list-style-type: none"> Continued support for bus services Re-introduce a Young Person's Travel Card Improve access at and to bus and rail stations Introduce taxi vouchers for people without a bus service Explore rural mobility hub pilot Explore the creation of a rural mobility hub 	Data gathering or management - no likely significant effect on any European Site	None
5: Improve the safety and efficiency of the Strategic Road Network to deliver a positive impact on the local road network	<ul style="list-style-type: none"> Undertake a Major Road Network review on the A52 and A53 to make them multi-modal Access for All corridors Undertake a Major Road Network review on the A511 and A5121 to make them multi-modal Access for All corridors Undertake a Major Road Network review on the A34 to make it into a multi-modal Access for All Corridor 	Whilst these corridors are some distance from a European Site, they will each require their own individual environmental assessment.	Each scheme to have its own individual environmental assessment
6: Improve the safety, efficiency and journey time reliability of the local road network	<ul style="list-style-type: none"> Carry out Local Safety Schemes as and when identified Continue to use area-wide 20mph speed limits as and when required Continue to run a programme of Road safety education Area-wide mass action programme 	It is not possible to tell at this stage what likely significant effects of any one of these	Where necessary, each scheme to have its own individual environmental assessment

	<ul style="list-style-type: none"> • Proactive Safe Systems approach to road safety • Deliver street lighting and traffic signal upgrade programmes • Invest in traffic monitoring and smart digital traffic management • Develop the Lane Rental Scheme 	<p>schemes might be as it is location specific.</p> <p>Where there is a risk of an impact on a European Site, a HRA will be conducted.</p>	
7: Deliver a whole-life asset management approach to improve the condition of the local road network	<ul style="list-style-type: none"> • Deliver the A513 Chetwynd Bridge refurbishment • Refurbish the A449 bridge • Deliver highway and footway structural maintenance, including drainage • Undertake carriageway and footway preventative maintenance • Invest in bus stop infrastructure, road signage and markings 	<p>Where specific schemes have been mentioned (e.g. bridge refurbishment) they will each require their own individual environmental assessment.</p>	
8: Support the efficient movement of freight whilst minimising the adverse impacts it can have on local roads, communities	-	-	-
9: Ensure the road network provides facilities that make walking, wheeling and cycling convenient and safe for all	<ul style="list-style-type: none"> • Invest in the cycle network in Stafford, Burton, Newcastle, Cannock, Tamworth and Lichfield 	It is not possible to tell at this stage	Where necessary, each scheme

	<ul style="list-style-type: none"> • Explore the greater use of the canal network • Off-road cycle network maintenance and investment in National Cycle Network • Rural network priority – South Staffordshire • Footway maintenance and improvement programme • Enhance cycle parking and introduce e-bike hire • Improve cycle accessibility and permeability on the existing highway • Pilot Healthy Streets and School Streets 	<p>what likely significant effects of any one of these schemes might be as it is location specific.</p> <p>Where there is a risk of an impact on a European Site, a HRA will be conducted.</p>	to have its own individual environmental assessment
10: Increase the use of the Public Rights of Way network	<ul style="list-style-type: none"> • Improve PROWs • Retain the Community Paths Initiative programme • Invest in PROW bridge maintenance 		
11: Deliver promotional activities that complement our active travel infrastructure	<ul style="list-style-type: none"> • Deliver the INTO project • Deliver bikeability training, walking buses, etc. • Investigate behavioural change initiatives 	Data gathering or management – no likely significant effect on any European Site	None
12: Integrate land-use planning and transport infrastructure, and ensure development is located where there are, or will be, travel choices	-	-	-
13: Ensure decisions made on the location and design of new development sites, provide high quality	-	-	-

connectivity by active and public transport			
14: Provide high quality active and public transport connectivity when reshaping and revitalising our town centres	Specific schemes in the towns of Stafford, Burton, Tamworth, Lichfield, Newcastle, Cannock, Burntwood, Uttoxeter, Stone, Rugeley, and Kidsgrove.	Data gathering or management - no likely significant effect on any European Site	None
15: Improve digital connectivity to give people the option not to travel and improve the way the road and transport networks operate	-	-	-
16: Improve data sharing with partners to enhance the efficient and safe operation of the local road network	-	-	-
17: Facilitate the transition to low emission vehicles amongst residents and businesses by focusing on off-road charging locations	Deliver the LEVI project, focusing on charging infrastructure at off-street locations.	Data gathering or management - no likely significant effect on any European Site	None
18: Support the bus industry by enabling investment in low emission buses and charging infrastructure	Identify and support funding applications to expand the number of zero emission buses in the county, focussing initially on AQMAs. Specific schemes might include bus depot EV infrastructure, bus rapid chargers at bus stations and purchasing electric buses.		

There are 5 theme objectives and associated actions that have potential to result in adverse effects on the integrity of European Sites in the absence of mitigation. The relevant objectives are:

- Objective 5: Improve the safety and efficiency of the Strategic Road Network to deliver a positive impact on the local road network.
- Objective 6: Improve the safety, efficiency and journey time reliability of the local road network.
- Objective 7: Deliver a whole-life asset management approach to improve the condition of the local road network.
- Objective 9: Ensure the road network provides facilities that make walking, wheeling and cycling convenient and safe for all.
- Objective 10: Increase the use of the Public Rights of Way network.

It is important to note that the actions outlined in the draft LTP contain no detail. At this stage, they are generic with little detail regarding where actual schemes will be located, their composition or extent.

5. Conclusion

It is reasonable to conclude that at this stage, the LTP is not a 'Plan' in the context of the Habitats Regulations because it does not contain detailed proposals; it is a "statement of general aspiration, or political will or general intentions". Therefore, a Habitats Regulations Assessment is not required. However, in the interest of transparency, it is important to record the decision-making process above, and to include safeguards for future work to comply with the Habitats Regulations.

The draft LTP contains a framework to ensure that schemes will not significantly affect the integrity of a European site. It has done this via the five delivery principles that will help to ensure the LTP adds value, contributes to social good, and improves protects the natural environment. It also gives assurance that an appropriate environmental assessment, including a HRA and SEA, will be carried out where it is considered necessary on a case-by-case basis. This will be done at every stage to identify and reduce any risk to protected sites, fauna and flora.

The County Council is doing more than it ever has, to minimise its impact on the environment. The Council follows best practice, including but not limited to embedding the principles of PAS 2080 into its decision-making processes.