Date: 11 December 2013

Our ref: Case 5912

Cannock Chase SAC Partnership

BY EMAIL ONLY



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Partner

Cannock Chase SAC Partnership meeting 28.11.13
Strategic mitigation strategy for new residential development

Update on advice regarding mitigation of recreation impacts on the SAC following our advice letter of 23 September 2013

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

In our letter of 23.9.13 we advised the Partnership to explore further options before any strategic approach is finalised, taking account of:

- Current status of SAC interest features
- On Site Measures with reference to proportionality and reasonable costs.
- Off site Measures as above and with respect to their function in light of the evidence.

Since our last advice letter we have progressed our review of the project evidence base. We have the following advice for the Partnership:

#### Extent of the zone

The proposed 15km zone of influence encompasses the home post codes which account for 75% of visitors. However this zone does not effectively catch one main group of users that may well be important in path wear and tear, mountain bikers. It is not expected that alternative green space would effectively divert this group of users from the SAC. Based on our experience of strategic N2k Site projects elsewhere in England we advise that policy application and achieving consistency over a 15km zone will represent a substantial and ongoing challenge.

#### Nature of the impacts

The principal impact of visitor pressure is loss of the SAC dry heath vegetation to new paths, path expansion, associated erosion and eutrophication. The component of the SAC involved is the dwarf woody shrub community (e.g. heather and bilberry), rather than the extent of bare ground forming the paths and tracks. This means that visitors have an impact on a small proportion of a large habitat component of the site, rather than a large proportion of a more restricted feature. Current visitor use of the site is high. However, based on the existing level of impact, we are minded not to consider the site to be in unfavourable condition. It should be noted that *existing* levels of visitor pressure may be regarded as forming part of the baseline.

**Timescale over which impacts may occur and likely extent -** (i.e. A 15% increase in visitors over the Local Plan period i.e. now until between 2027-2031)

The impacts are unlikely to increase in proportion to the number of visitors but there may be a marginal increase in the number and width of paths, or the severity of eutrophication, probably affecting less than 0.5% of site area.

- 36ha of heavily disturbed path and track surfaces (by extrapolation<sup>1</sup>) = 3% of SAC area
- 15% increase in visitors assuming a straight line increase in effects 3% x 15% = 0.45%

#### **Trends**

We will seek further evidence from aerial photo analysis in order to set the baseline for future monitoring of recreation on the SAC.

### 'Likely Significant Effect'

We consider that an increase in visitor numbers on the scale expected is likely to have a significant effect.

Our reasoning is as follows -

- 1. Absence of protocol for visitor management and low staff presence
- 2. Increase in numbers of visitors forecast over the plan period
- 3. Conservation objectives for SAC can be interpreted to accept the current extent of paths and tracks but seek avoidance of their expansion or proliferation

However the scale of these impacts is likely to be towards the lower end of any scale of significance.

1. The nature and location of the impacts means that symptoms of additional recreation pressure are most likely to be focused on existing path and track surfaces (forming part of the baseline site conditions) or at their edges where they adjoin heathland vegetation (heather, bilberry etc). It is in the last scenario where additional impacts may arise.

# On site management options

In the absence of an existing protocol for path management and little staff presence on site the introduction of a scheme of access management measures on site would be expected to have a new effect. If a coordinated approach can be established between the County Council and Forest Enterprise, which encourages uses off the SAC and onto the surrounding forestry land, this could have a very substantial effect in reducing visitor impacts on the SAC. It should be effective enough to neutralise the marginal increase in impacts likely to arise from the additional 15% increase in visitor numbers over the local plan period.

Proportionate measures to manage visitors on the SAC are likely to be less costly than repeated case specific appropriate assessment and much less than SANGs. Measures to manage visitors would therefore be expected to provide the least burdensome method by which developers and planning authorities could avoid a likelihood of significant effect.

<sup>&</sup>lt;sup>1</sup> 'Impacts of Recreation to Cannock Chase SAC' report (Footprint Ecology) – section 4.

#### Way forward

We have met separately with Staffordshire County Council and Forest Enterprise to describe this approach and establish in principle agreement over a collaborative approach to a proportionate set of on-site measures which the LPA partners will be able to consider for developer funding. Both have provided very positive responses and a further meeting of these two key land managers has been arranged to consider essential components of an access and visitor management plan for the land they manage and its relationship with similar work for the Cannock Chase AONB as a whole. In principle, Two 'win, win' scenarios potentially unfold:

- 1. Enabling development to proceed and safeguarding the SAC with a proportionate new access management strategy
- 2. Facilitating effective access/visitor management on the SAC while facilitating additional, sustainable visitor access within the forest estate.

# Summary of current position:

- 1) There is a likelihood of significant effect that justifies proportionate measures to manage the risk to the SAC.
- 2) SANGS are not necessary to protect the SAC; Their effectiveness is uncertain in view of the evidence base for Cannock Chase and their cost relative to on site management measures is likely to be high compared to the expected increase in visitor impacts.
- 3) As soon as a package of access and visitor management measures is put forward by the land managers, Natural England will advise the SAC Partnership on whether we consider it appropriate to safeguarding of the SAC from new development impacts;
- 4) The LPA partners will then need to consider how best to secure developer funding through the planning system.

Please get in touch with me on 0300 060 1640 (or via email - <a href="mailto:antony.muller@naturalengland.org.uk">antony.muller@naturalengland.org.uk</a>) if you have any queries about the specific advice in this letter.

Yours sincerely

Antony Muller Lead Adviser – Natural England Land use Operations Team