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Date: 19th June 2018

Dear Merlin,

Many thanks for your letter dated 4th June 2018 detailing Natural England's outstanding comments in relation to our Habitats Regulations Assessment (April 2018) (HRA).

We are satisfied that our HRA is adequate, without the need for further supporting evidence.

However, we are in a position to be able to take the following actions to seek to address the matters that you now raise, without impacting upon the examination timetable. It is anticipated the final report will be completed by the end of September, with surveys being undertaken in July and September.

Recreational pressure at Strensall Common SAC

The Council will commission expert advice to quantify existing use of the site by the public. This will seek to describe the numbers of visitors alongside diurnal patterns, will identify how far they travel to the site and the mode of transport used. Further, it will explore behaviour on site including the most popular routes or destinations and the time enjoyed on site. It will supplement this information with observations to identify the impact of this behaviour on the conservation objectives of the European site.

The exercise will then draw on this information to suggest any changes in the number and behaviour of visitors that can be expected from the delivery of the local plan and, in particular, the impact of the three local allocations (SS19/ST35, E18 and H59).

The outputs will inform the identification of further appropriate pragmatic, deliverable mitigation measures that the Council would expect to be adopted, if necessary, to inform the development of suitable recreational strategies (as already required by policy SS19) by future developers with the overall goal of ensuring that the Council can ascertain that an adverse effect on the integrity of the European site could be avoided.

We would welcome working with you to finalise the visitor survey methodology to ensure that it meets your expectations. We will be in touch to arrange a meeting between us following procurement of consultants.

Air pollution

Thank you for directing us to Natural England's published resources in relation to air quality. The Council has actively reviewed its existing air pollution data to explore if the plan already meets the requirements of Natural England's Report NECR210 '*Assessing the effects of small increments of atmospheric nitrogen deposition (above the critical load) on semi-natural habitats of conservation importance*' – ie that the Plan (and the predicted process contribution) will not result in the loss of any species richness (or diversity) from the qualifying heathland features of the European site.

Drawing on Table 21 of NECR210, we understand that our maximum additional contribution of 0.281 kg/N/ha found at the end of the Plan period at the roadside and progressively declining thereafter with distance, would fall below the thresholds in NECR210 that can be taken to cause a reduction of one species from the existing heathland community. The thresholds vary with the background deposition which itself declines from c24kg to 15kg from the current situation to that in 2033 respectively. The added deposition of 0.281kg is an order of magnitude lower than this. This would seem to lead to a conclusion of no adverse effects on integrity of Strensall Common (no AEOI). We would appreciate if you could confirm whether this approach satisfies Natural England's comments in relation to this matter.

Should you wish to discuss details set out in this letter, please don't hesitate to contact me. We look forward to continuing our dialogue on this matter.

Yours sincerely

Rachel Macefield
Forward Planning Manager