

Date: 04 June 2018  
Our ref: 247643



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**BY EMAIL ONLY**

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Dear Alison Cooke

**Planning consultation:** Update to the City of York Local Plan Habitats Regulations Assessment dated April 2018 including updated air quality evidence.

Thank you for your consultation on the above dated 18 May 2018 which was received by Natural England on the same date.

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

Natural England has commented previously upon the publication draft of the City of York Local Plan in our letter dated 04 April 2018 (our ref 239830) and on the Habitats Regulations Assessment in our letter dated 08 May 2018 (our ref 246074). This letter represents our further comments on the updated Habitats Regulations Assessment and Air Quality evidence received by Natural England on the 18 May 2018.

Natural England broadly welcomes the updated report however we have a number of outstanding concerns regarding the assessment of recreational disturbance on Strensall Common Special Area of Conservation (SAC) and air quality impacts as a result of vehicle emissions on Strensall Common SAC and

#### **Recreational Disturbance – Strensall Common SAC**

Natural England welcomes the additional assessment and further mitigation and avoidance measures set out in section 4 of the assessment. However we remain of the opinion that insufficient evidence has been provided to back up the conclusion of no adverse effects on integrity. We would expect to see a robust and comprehensive visitor assessment. For more information please see our previous response dated 04 April 2018 (our ref 239830).

#### **Air Quality Strensall Common SAC**

Natural England welcomes the updates and clarifications regarding the air quality assessment which broadly satisfy our previous concerns however we remain concerned about the level of detail provided in relation to Strensall Common SAC, considering the emissions levels predicted. We advise that the long term impact of emissions on species diversity in the habitats present is more clearly detailed. For this we advise reference is given to Natural England Commissioned Report NECR210 titled 'Assessing the effects of small increments of atmospheric nitrogen deposition (above the critical load) on semi-natural habitats of conservation importance' in particular section 6 which includes tables 20-22 regarding the calculations the loss of species richness based on habitats present and emissions levels. Should levels not reach those expected to lead to the loss of species richness we would be satisfied with the conclusion of no adverse effects on integrity in the

context of the wider assessment you have carried out.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter please contact Merlin Ash on at [Merlin.ash@naturalengland.org.uk](mailto:Merlin.ash@naturalengland.org.uk) or on 02080 266382. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Merlin Ash  
Yorkshire and Northern Lincolnshire Area Team  
Natural England