



Appropriate Assessment
of
Ashford Borough Council's Town Centre Area
Action Plan – Regulation 27 Publication Version

**Assessment of the Core Strategy of the Ashford Borough Local Development Framework
in relation to Natura 2000 sites**

Background

Under Regulation 48 of the 'Habitats Regulations 1994' an Appropriate Assessment is required to test whether a DPD is likely to have an adverse impact on the integrity of any Natura 2000 sites.

Natura 2000 sites are sites which are of exceptional importance in respect of rare, endangered or vulnerable habitats and species within the European Community. These sites are also referred to as European sites consist of Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Offshore Marine Sites (OMS).

Core Strategy Appropriate Assessment

An Appropriate Assessment was carried out for the Ashford LDF Core Strategy in April 2007, which should be read in conjunction with this Paper (see Appendix)

A full Appropriate Assessment was necessary as the Core Strategy, alone, and in combination with other plans and projects (as detailed in the AA of the Draft RSS) was deemed likely to have a significant effect on the Wye and Crundale Downs Special Area of Conservation (SAC).

The key findings of the Assessment into the Core Strategy identified that both recreational pressure and air pollution, resulting from the growth of the Ashford have the potential to adversely affect the Wye and Crundale Downs SAC. The likely potential significant effects on the integrity of the European Sites were therefore considered to be

- A.** Impacts from air pollution – from increased car use,
- B.** Recreational impacts – from increased recreational pressure on the site

However the Appropriate Assessment also concluded that these significant effects were deemed to have been largely mitigated against, by the approach set out within Core Strategy. It stated '*The plan preparation process, influenced by the Sustainability Appraisal (SA) has ensured that options are chosen which have sufficiently reduced the impacts of these significant effects that the Core Strategy impacts on integrity have been nullified*'.

The most notable policies and approach which mitigated the significant effects were considered to be:

- Final Masterplan (Policy CS2 Borough Wide Strategy)
- Transport (Policy CS15 Transport)
- Tourism (Policy CS17 Tourism)
- Rural Options (Policy CS6 Tenterden and the Villages)
- Infrastructure (Policy CS18 Meeting the Community's Needs)

Town Centre Area Action Plan Appropriate Assessment

In line with requirements as set out under Regulation 48 of the 'Habitats Regulations 1994', Ashford Borough Council has screened the Town Centre Area Action Plan proposals for any potentially significant effects.

The Council's starting point was to look again at what was already assessed as part of the Core Strategy Appropriate Assessment, particularly given the synergies of the approaches set out within both Policy CS3 and the Town Centre Area Action Plan. Policy CS3 of the Core Strategy envisaged approximately 170,200 sqm of new commercial / retail / leisure / education floorspace and around 2,500 residential units. The Town Centre Area Action Plan promotes 151,000sqm of new commercial / retail / leisure / education floorspace (19,000 sqm of retail use has already been built since the Core Strategy production) and 2,750 residential units.

As the above shows, the levels of development proposed in the emerging Town Centre Area Action Plan are broadly consistent with the numbers alluded to in the 'parent' Core Strategy. It is therefore considered a detailed assessment is not required for the AAP on the basis, given the synergy, that this has already been assessed, in detail, as part of the Core Strategy Appropriate Assessment.

However, Natural England requested the Council to complete a screening exercise in relation to the Town Centre Area Action Plan contents, in relation to both any increase in indirect recreational pressure and any adverse effects on air pollution in respect of the proposed town centre policies. In carrying out this screening assessment, the Council has taken into consideration the following :-

- the distance between the Wye & Crundale Downs SAC and the town centre area and explain why these differences are sufficient to determine that there will be no adverse effect upon integrity of the SAC
- the mitigation measures detailed within the AA of the Core Strategy and where relevant, any additional mitigation policies proposed in the Town Centre AAP itself. Such measures are the basis for determining whether the AAP in question will have any significant effect upon the integrity of the Wye and Crundale Downs SAC

In addition, this screening exercise has also taken into account any potential impact on protected sites located in neighbouring local planning authority areas, particularly in relation to impact on recreational pressure. The following protected sites fall within ten kilometres of the Borough boundary and have formed part of the screening assessment under the Habitats Regulations Assessment.

- Folkestone to Etchinghill Escarpment SAC
- Parkgate Down SAC
- Dungeness SAC
- The Blean Complex SAC
- Dungeness to Pett Level SPA
- The Swale SPA
- The Swale Wetland of International Importance under the Ramsar convention (Ramsar Site)

In tandem with this part of the screening exercise, the Council has also taken into account the likely proposed additional housing development arising within neighbouring local planning authorities in order to be as thorough as possible in terms of potential recreational pressure impact on the above areas. The neighbouring local planning authorities taken into account are:

- Swale Borough Council
- Canterbury City Council
- Maidstone Borough Council
- Shepway District Council
- Tunbridge Wells Borough Council
- Rother District Council (E Sussex)

Screening the Town Centre Area Action Plan

Distances from Ashford Town Centre (approx)

▪ Wye and Crundale SAC	6 miles
▪ Stodmarsh SAC	23 miles
▪ Stodmarsh SPA	23 miles
▪ Folkestone to Etchinghill Escarpment SAC	25 miles
▪ Parkgate Down SAC	21 miles
▪ Dungeness SAC	22 miles
▪ The Blean Complex SAC	20 miles
▪ Dungeness to Pett Level SPA	25 miles
▪ The Swale SPA	35 miles
The Swale Wetland (Ramsar Site)	

(data derived from Joint Nature Conservation Committee website - <http://www.jncc.gov.uk>)

Approximate Residential Numbers form neighbouring authorities

The most up to date source for this information is considered to be the adopted SE Plan (2009). Policy H1 'Regional Housing Provision' sets out the additional housing figures for individual authorities / districts, within the South East Area, between the period of 2006 – 2026.

▪ Swale	10,800
▪ Canterbury	10,200
▪ Maidstone	11,080
▪ Shepway	5,800
▪ Tunbridge Wells	6,000
▪ Rother District Council (E Sussex)	5,600

Screening Assessment Result

The distances show that the protected area most likely to be affected indirectly by recreational pressures is the Wye and Crundale SAC, given that it falls within 7 miles of Ashford Town Centre. This was also the key conclusion from the Core Strategy Appropriate Assessment, which detailed the likely impact on its integrity of the wider Growth in Ashford. (Section 7 of the Core Strategy Appropriate Assessment)

The other protected areas all fall at least 20 miles outside of the Town Centre and as such are unlikely to be affected to the same degree by virtue of their distance and the likely available alternative recreational opportunities that will be present within those local authority areas. As such, it is concluded that, on their own, the growth proposals in the Town centre AAP would not have a significant indirect effect on any protected area outside the Borough boundary.

However given the increase in population in the Town Centre, in line with the increases proposed within the neighbouring local authorities, it is reasonable to assume that some additional recreational pressure in particular may be forthcoming on at least some of the areas mentioned above.

LDF mitigation response

Core Strategy

The Core Strategy Appropriate Assessment identified mitigation measures which would nullify the significant effects on the integrity of the protected sites.

Recreational Pressure

The Core Strategy sets out how the growth of Ashford will provide the necessary services and infrastructure to provide for the recreational needs arising from development. The visions supported by the policies will, in combination, avoid any adverse effects from recreational pressure. These include :

- Policy CS1 B: The conservation and enhancement of the historic environment and built heritage of the borough
- Policy CS1 G: The timely provision of community services and other local and strategic infrastructure to provide for the needs arising from development
- Policy CS1 K: The creation of an integrated network of green spaces to provide a framework for growth – helping to serve the recreational needs of the community, enhancing biodiversity and providing green routes for pedestrians and cyclists.
- Policy CS 17: Tourism
- Policy CS 18 : Meeting the Community's Needs

Within these policies key pieces of infrastructure are proposed, which will reduce the recreational pressure on surrounding protected sites. These include :

- Green Necklace: a green corridor connecting the Julie Rose stadium in North Ashford to the proposed Great landscape Parks in South Ashford.
- Great Landscape Parks : the creation of a Discovery Park as a "people's park" for open-air events and recreation, and a Wetlands Park as a natural, uncultivated landscape
- Exhibition facilities
- Potential location for a Kent Multi-Use Commercial Events Arena/Conference Centre.

The Core Strategy also indicated the intention (para14.12 of the Core Strategy, 2006) to prepare a Green and Blue Grid strategy to be adopted as a Supplementary Planning Document (SPD). (see below for more details).

The Annual Monitoring Report (AMR) set out a number of Core Strategy policy indicators to monitor policy implementations. A number of these indicators consider the provision of leisure and tourism opportunities.

CS1 (H,L) Guiding Principles & CS17 Tourism	Amount of existing tourism facilities lost (unless satisfactory replacement facilities are provided) and new tourism facilities gained as a result of new development
CS1 (G,H,L) Guiding Principles , CS8 Infrastructure Contributions & CS18 Meeting the Community's Needs	Amount of existing public recreation, sports, children's play, leisure, cultural , school and adult education, youth, health, public service and community facilities lost (unless satisfactory replacement facilities are provided) and gained as a result of new development.
CS1 (G,K) Guiding Principles & CS18 Meeting the Community's Needs	Amount of Open Space meeting standards set out in the Open Spaces Strategy

Air Quality Mitigation

A sustainable approach to transport was taken forward in the Core Strategy, culminating in the following policies set out in the Core Strategy document.

- Policy CS1 A: Development that respects the environmental limits that protect the high quality built environment and natural environment of the Borough, minimises flood risk, provides for adequate water supply, and protects water and air quality standards.
- CS1 I: A wider choice of easy to use forms of sustainable transport to serve development that generates significant demand for movement.
- CS15 : Transport – promotes an enhanced public transport system and other non-car based modes of travel, particularly in the Growth Area

Within the vision and the Core Strategy policies there are a number of key references which will reduce the use of the car, and thus air pollution and its predicted effects on the SAC. These include :

- Compact development and denser town centre.
- The use of sustainable transport
- High quality, high frequency public transport system in the new major Urban Extensions
- Mixed-use developments to provide a range of jobs alongside new housing development, thus reducing the need to travel.
- Prioritising the high street for pedestrians and cyclists.
- Provision of green spaces within and between developments to disperse air pollution.
- High frequency SMARTLINK public transport system to link the town centre and the international and domestic railway stations with the major peripheral growth areas.
- Achieving a level of modal change in transport patterns to enable Ashford to grow.
- Park & Ride facilities at the Warren, Waterbrook and Chilmington Green.
- Motorway improvements to existing junctions 9 and 10, and the creation of a new junction 10A
- New mixed use link roads
- New pedestrian and Cycle links
- Pedestrian/Cycle/Bus improvements
- Remodelling of the town centre ring road
- A Transport Strategy for Ashford has also been published.

The Annual Monitoring Report (AMR) also sets out a number of Core Strategy policy indicators to monitor policy implementations. A number of these indicators consider the impact of air pollution. These are :-

CS1 (L) Guiding principles & CS15 Transport :	Amount of new residential development within 30 minutes public transport time of: a hospital, a primary school; a secondary school, areas of employment; and a major retail centre.
	Annual average peak hour traffic flow on principal roads
	Cycling in Ashford

Town Centre Area Action Plan

The Town Centre Area Action Plan includes two policies which directly link to the issue of recreational pressure and also effect the issue of air quality.

Policy TC29 'Green Corridors in the Town Centre' – sets out the importance of green corridors in terms of their; visual amenity value, recreational offering, valuable nature conservation role and wildlife corridors which link the urban habitats to the countryside beyond. The policy seeks these areas protection and enhancement.

Policy TC30 'Open Space, Recreation, Sport and Play' – sets out the importance of these areas in enchainning public places, parks and green spaces, alongside providing for the needs of the local community. The policy seeks their promotion and encourages a greater accessibility to these areas to help ensure they meet the needs of the existing and growing population.

Combined, these policies should provide for quality recreational space within the Town Centre (or close by) to go some way to meeting the recreational needs of the Town Centre's existing and future population.

These policies also relate to the issue of air quality. The promotion of greater accessibility to these areas, particularly for pedestrian and cyclists should ensure that these recreational assets can be utilised without the need for additional car trips. This may make them more appealing than other, more removed, recreational areas such as the Wye and Crundale downs SAC.

Overall, it is considered that the policies contained within the Core Strategy and the Town Centre AAP are adequate to ensure that any additional recreational pressures, and impacts on air quality, on the Wye & Crundale Downs SAC would be mitigated to the extent where there would be no significant effects on the integrity of the SAC.

Green and Blue Grid SPD

In addition, this SPD, intended to be produced around the end of 2009, will set out how Ashford will provide for multi-functional green-space uses, including providing for an enhanced recreational and cultural experience. The delivery of the SPD will, in combination with other Core Strategy and Town Centre AAP policies, help to meet the recreational needs of the growing town and reduce further any indirect recreational impact, that may occur on the Wye and Crundale Downs SAC.

Overall Conclusion

In conclusion, this Screening Assessment of the Town Centre AAP has set out the following:-

- 1) The scale of development proposed in the Town Centre AAP is broadly consistent with that previously assessed as part of the Core Strategy AA and therefore, any likely significant effects derived from the proposed growth of Ashford Town Centre have already been assessed as part of the Core Strategy AA.

- 2) The distance from the Town Centre to protected sites beyond the Borough boundary is sufficiently large for any indirect effects arising from the Town centre proposals to be insignificant.
- 3) When combined with the proposed additional housing numbers likely to come forward in neighbouring authorities, there is likely to be an impact on protected sites within those authorities in terms of recreational pressure, when looking at AAP, Core Strategy,
- 4) Any such effects are suitably mitigated against through the policies contained within the adopted Core Strategy, the Town Centre Area Action Plan and the forthcoming Green and Blue Grid SPD
- 5) Therefore, a detailed AA is not required for the Town Centre Area Action Plan.

Appendix



Appropriate Assessment
of
Ashford Borough Council's Core Strategy
Development Plan Document

April 2007

**Assessment of the Core Strategy of the Ashford Borough Local Development Framework
in relation to Natura 2000 sites**

Large print copies, audio
and Braille versions of
document are available on
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330229.

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1. Summary

- 1.1. In response to para 10.1 of the Sustainability Appraisal Report¹ this report documents the Appropriate Assessment into the Ashford Local Development Framework Core Strategy Development Plan Document (DPD). It has been carried out, in consultation with Natural England (NE).
- 1.2. An Appropriate Assessment tests whether Ashford's Core Strategy is likely, in combination with other plans, to have an adverse impact on the integrity of any Natura 2000 sites. The report details how the Core Strategy would be likely to have a significant effect on the Wye and Crundale Downs SAC, Stodmarsh SAC and SPA (as identified in the AA of the South East Plan), and the subsequent mitigation measures outlined in the Core Strategy.
- 1.3. The Appropriate Assessment (AA) has drawn on the baseline information collected as part of the Sustainability Appraisal process and the proposed mitigation measures that have been taken forward into the Core Strategy DPD. As a result of the AA it is determined that there is no change required to the Sustainability Appraisal Report (SAR) at this stage in the Local Development Framework (LDF) process. This report also draws heavily on the findings of the Appropriate Assessment of the Draft South East Plan².

2. Background

- 2.1. On 20 October 2005, the European Court of Justice (ECJ) ruled that the United Kingdom had failed to transpose the provisions of Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) into UK Law. The Regulations were then transposed into UK Law in September 2006. Ashford Borough Council had already produced a Preferred Options Report (June 2005) by the time of the ECJ ruling and was in the final stages of its Core Strategy preparation at the time of the UK transposition.
- 2.2. Natura 2000 sites are sites which are of exceptional importance in respect of rare, endangered or vulnerable habitats and species within the European Community. These sites which are also referred to as European sites consist of Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Offshore Marine Sites (OMS).

1 Ashford Borough Council : Strategic Environmental Assessment/Sustainability Appraisal of Ashford's Local Development Framework Core Strategy : Sustainability report , October 2006

2 South East England Regional Assembly, Appropriate Assessment of the draft South East Plan, 2006

3. Appropriate Assessment requirements

3.1. The guidance available at this date is limited to :

- Planning Policy Statement 9 “Biodiversity and Geological Conservation” 2005
- Circular 06/2005 “Biodiversity and Conservation”
- European Commission “Assessment of plans and projects significantly affecting Natura 2000 sites – Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (November 2001). Hereafter this is called the European Commission guidance.
- Planning for the Protection of European Sites: Appropriate Assessment (DCLG,2006)

3.2. The Habitats Directive Article 6 paragraphs (3) and (4) stated

“(3) Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subject to Appropriate Assessment of its implications for the site in view of the site’s conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.

(4) If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.”

4. Decision making

4.1. The European Commission guidance sets out a number of principles as to how to approach the decision making during the process. The primary one is “*the precautionary principle which requires that the conservation objectives of Natura 2000 should prevail where there is uncertainty*” (Section2.2). The following stages (DCLG Guidance³ 2006) were applied in the Appropriate Assessment (AA) of the Core Strategy DPD.

³ ‘Planning for the Protection of European Sites : Appropriate Assessment’ (2006)

Stages in the assessment

AA Task 1 Likely significant effects

Screening for likely significant effects - Determining whether the plan 'in combination' is likely to have a significant effect on a European site

AA Task 2 Appropriate Assessment and ascertaining the effect on site

integrity

If there are likely significant effects carry out an Appropriate Assessment. This will ascertain the effect on the implications of the site's conservation objectives⁴ and integrity of the European site⁵

AA Task 3 Mitigation and Alternative solutions

Mitigation of adverse effects on the integrity of the European site, and alternative solutions.

5. Ashford Local Development framework

- 5.1. Ashford's Core Strategy DPD proposes a total of 16,770 new dwellings and related uses, and 16,700 additional jobs within the Ashford Growth Area between 2006-2021. In the rest of the Borough, land for 1,180 new dwellings will be developed by 2021, alongside appropriately scaled employment opportunities where justified.
- 5.2. Policy CS6 Tenterden and the Villages provide further detail on the potential of development at Wye. For Phase 1 (2006 – 2013) it proposes 35 dwellings in Wye, and for phase 2 (2014-2021) 40 dwellings. This excludes windfall sites.
- 5.3. The following policies within the Submission Core Strategy DPD were identified as requiring particular consideration within this study, as mitigation measures for the adverse effects on the SAC, see chapter 8.
 - CS1 : Guiding Principles (A , C & I)
 - CS2 : Borough Wide Strategy
 - CS3 : Ashford Town Centre
 - CS4: Ashford Urban Area
 - CS5: Ashford Urban Extensions

4 Habitats Regulations 2006 Reg 85B (1)(b)

5 Habitats Regulations 2006 Reg 85B(4) inserted by the 2006 amending Regulations

- CS6: The Rural Settlement Hierarchy
 - CS7: Development in the Countryside
 - CS11: Biodiversity
 - CS15 : Transport
 - CS17: Tourism
 - CS21: Water supply and treatment
- 5.4. The final Sustainability Report for the Submission Core Strategy stated the need to carry out a screening for an Appropriate Assessment following the amendments to the UK Conservation Regulations 1994. Below is an extract from paragraph 10.1 of the SA report⁶. Further detail from the SA will be set out in the following chapters. This Appropriate Assessment is the Council's response to the SA recommendations.

Appropriate Assessment of the Ashford LDF Core Strategy

If a Natura 2000 site (RAMSAR, a Special Area of Conservation (SAC) or a Special Protection Area (SPA)) site is affected by development resulting from the plan in combination with other plans and programmes an Appropriate Assessment (AA) under The Conservation (habitat, & C) Regulations 1994 will be required. The presence of the Wye and Crundale Downs SAC triggers the requirement for a full screening for an AA. Given the timing of the Core Strategy preparation it is recommended that work on the AA is started immediately.

⁶ Ashford Borough Council : Strategic Environmental Assessment/Sustainability Appraisal of Ashford's Local Development Framework Core Strategy : Sustainability report , October 2006

6. AA Task 1 : Likely significant effects (Screening)

- 6.1. The Ashford BC Core Strategy (DPD) has been screened to identify whether it is '*likely to have a significant effect*' on a European site (either alone or in combination with other plans or projects).
- 6.2. The Core Strategy alone, and in combination with other plans and projects (as detailed in the AA of the Draft RSS) is likely to have a significant effect on the Wye and Crundale Downs SAC and the Stodmarsh SPA and SAC. Details on these Natura 2000 sites are shown below.
- 6.3. The Wye and Crundale Downs is the only site in the Borough which is classified as a Natura 2000 site. Information available from Natural England and the Joint Nature Conservation Committee (JNCC) provides a good introduction to the reasons for the designation of the Wye and Crundale Downs as a Special Area of Conservation (SAC) and its objectives. These are sourced from the AA of the Draft South East Plan⁷.

Wye and Crundale Downs SAC
Qualifying Features
<ul style="list-style-type: none">• Dry grasslands and scrublands on chalk or limestone, including important orchid sites.
Comments on Nature conservation Importance
<ul style="list-style-type: none">• Wye and Crundale Downs consists of semi-natural calcareous grassland. It has an important assemblage of rare, scarce and uncommon orchids, including early spider-orchid, burnt orchid, lady orchid and the largest UK colony of late spider orchid, representing about 50% of the national population.
Key Environmental Conditions to Support Site Integrity
<ul style="list-style-type: none">• Maintenance of grazing• Minimal recreational trampling• Minimal air pollution – nitrogen deposition may cause reduction in diversity, sulphur deposition can cause acidification• Absence of direct fertilisation• Well-drained soils

⁷ Appropriate Assessment of the Draft South East Plan, Final Report , 2006 (SEERA)

Annex I habitats
Semi-natural dry grasslands and scrubland facies : on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites) (51.69% cover)
<i>Asperulo-Fagetum</i> beech forests (1.8% cover)

Stodmarsh SAC
Qualifying Features
<ul style="list-style-type: none"> • Desmoulin's whorl snail • Comments on Nature Conservation • A sizeable population of Demoulin's whorl snail <i>Vertigo moulinsiana</i> lives beside ditches within pasture on the floodplain of the River Stour.
Comments on Nature conservation Importance
<ul style="list-style-type: none"> • Maintenance of sufficient water to support marginal/marsh vegetation and high water quality.
Key Environmental Conditions to Support Site Integrity
Maintenance of sufficient water to support marginal/marsh vegetation and high water quality

Stodmarsh SPA
Qualifying Features
Populations of European importance of the following migratory species :
<ul style="list-style-type: none"> • Bittern (2 individuals) • Hen harrier
Comments on Nature conservation Importance
<ul style="list-style-type: none"> • Site consists of marshland with large reed-beds, shallow lagoon, grazing meadows and wet woodlands.
Key Environmental Conditions to Support Site Integrity
<ul style="list-style-type: none"> • Minimal recreational disturbance • Maintenance of grazing regime • Maintenance of water supply • Absence of nutrient enrichment

Source: Appropriate Assessment of the draft South East Plan (SEERA,2006)

6.4. The potential adverse effects are shown in Table 1 below.

Table 1 – Potential adverse effects on European Sites from the Draft South East Plan

	Risk of effects from increased recreational pressure	Risk of effects from region-wide air pollution	Risk of effects from water abstraction	Risk of effects from WWTW ⁸ and landfill discharges
Wye and Crundale Downs SAC	X	X		
Stodmarsh SAC			X	X
Stodmarsh SPA		X	X	

Source: Adapted from the Appropriate Assessment of the draft South East Plan (SEERA,2006)

- 6.5. Policy H1 of the Draft South East Plan sets out how Ashford will deliver a total of 22,700 new dwellings between 2006 and 2026. The Core Strategy in Policy CS2 therefore sets the LDF plan period housing target of 16,770 new dwellings by 2021. The LDF also responds to Policy EKA1 of the South East plan which sets out in detail the amount and distribution of housing in the Ashford Growth Area up until 2026.
- 6.6. Therefore it is considered that the Core Strategy (including Policy H1 and EKA7 of the Draft South East Plan) will have a potential significant effect and an Appropriate Assessment is required.
- 6.7. It must however be noted that at the time of the draft South East Plan *EKA7: Employment locations* identified development at the Wye Campus of Imperial College London. Since the draft version the reference to the development at Wye Campus Imperial College has

8 Waste Water Treatment Works

been withdrawn from the plan. This would reduce the potential indirect impacts identified in the AA of the South East Plan.

7. AA TASK 2 : Appropriate Assessment and ascertaining the effect on site integrity

- 7.1. Guidance states that ‘*The implications for the conservation objectives should be examined to ascertain whether the plan option has an adverse affect on the integrity of the European site*⁹. Integrity is described as ‘*the site’s coherence, ecological structure and function across its whole area that enables it to sustain the habitat, complex of habitats and/or the levels of populations of species for which it was classified*’¹⁰
- 7.2. The potential effects on the integrity of the identified Natura 2000 sites from the Draft RSS, and the Core Strategy DPD are detailed below.

Wye and Crundale Downs
Possible Impacts Arising from Plan
Development of 35,000 new homes (Policy H1) in Ashford, Shepway and Canterbury and the expansion of the nearby Wye Campus of Imperial College (Policy EKA7) may result in substantially increased recreational pressure.
The development of 35,000 new homes and 1 million sq m of new business floorspace in Ashford, Shepway and Canterbury (South East Plan pages 270 and 282), and associated increase car use may lead to increased atmospheric pollution and acidification of chalk grassland.

Stodmarsh SAC
Possible Impacts Arising from Plan
Development of Broad Oak Reservoir (Policy NRM2) and of 29,900 new houses (Policy H1) and 833,000 sq m of new business floorspace in Ashford and Canterbury (South East Plan pages 270 and 282) could result in increased abstraction from the River Stour, abstraction takes place along the full length of the River Stour, however the River Stour as it flows through Stodmarsh is tidal (the tidal limit is at Fordwich) and therefore the effect of upstream abstraction is largely masked by tidal patterns, Broad

⁹ ‘Planning for the Protection of European Sites : Appropriate Assessment’ (2006) para 5.13

¹⁰ ODPM Circular 06/2005 : Biodiversity and Geological Conservation, para.20

Oak Reservoir is likely to abstract from downstream. Despite this, English Nature (Natural England) are concerned that drawdown of water from the site as a result of increased abstraction may mean that insufficient water will be retained within the ditch system to support the marginal vegetation that this snail requires.

Development of 29,900 new homes and 833,000 sq m of new business floorspace in Ashford and Canterbury may result in increased wastewater disposal into the River Stour and an associated decline in water quality, principally due to nutrient enrichment and decreases in dissolved oxygen. They may result in an adverse effect on the Desmoulin's Whorl Snail.

The part of the site that supports the snail is inaccessible to recreation.

Stodmarsh SPA

Possible Impacts Arising from Plan

Development of 29,900 new houses and 833,000 sq m of new business floorspace in Ashford and Canterbury is not considered likely to result in nutrient enrichment or deterioration in water quality.

Housing development under the South East Plan, and associated increased car use may lead to increased atmospheric pollution and nitrogen enrichment, resulting in changes to the habitats for which the species of European importance depend.

Source: Appropriate Assessment of the draft South East Plan (SEERA,2006)

- 7.3. The likely potential significant effects on the integrity of the European Sites are therefore:
- a. Impacts from air pollution – from increased car use
 - b. Recreational impacts – from increased recreational pressure on the site
 - c. Land take, through the designation of sites for development – this is unlikely to be realised as their protection is secured by national policy in PPS9 and Policy NRM4 of the draft South East Plan which will provide for “*the highest level of protection for nationally and internationally designated sites*” (Policy NRM4)
 - d. Effects of water abstraction – the AA of the Draft South East Plan highlighted that in respect of the Stodmarsh SPA

development at Ashford and Canterbury is not considered likely to result in nutrient enrichment or deterioration in water quality.

- e. Wastewater Treatment Works and landfill discharges – increased wastewater disposal.

7.4. In assessing the effect on the integrity of the Wye and Crundale Downs and Stodmarsh SAC and SPA, an integrity checklist from Box 10 of the European Commission has been used.

Integrity of the site checklist

Does the plan have the potential to:

i) cause delays in progress towards achieving the conservation objectives of the site ?

Increased pressure on the site from additional recreational pressure resulting from the growth in Ashford may affect the conservation objectives, e.g. by trampling.

ii) interrupt progress towards achieving the conservation objectives of the site

An increase in car use as a result of Ashford's growth may lead to an increase in air pollution which may result in a reduction in diversity and acidification.

Increased recreational pressure from increased growth.

iii) disrupt those factors which help to maintain the favourable conditions of the site

Increased recreational pressure as a result of increased population may result in a disruption of the grassland and orchids.

Decline in water quality due to nutrient enrichment and decreases in dissolved oxygen can lead to eutrophication.

iv) interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site

There would be an increase in the population, and consequently this may increase the number of people visiting the site.

7.5. The AA has identified that there could be effects on the integrity of the sites without mitigation measures. The next stage is to cancel out any adverse effects fully through appropriate mitigation measures. These mitigation measures will focus on the potential significant effects from (A) Air pollution, (B) Recreational pressure and (E) Wastewater disposal, in view of the conclusions arrived at in 7.3 with regards to (C) Land take and (D) Water abstraction.

8. AA TASK 3 : Mitigation measures

8.1. The mitigation measures proposed in the Core Strategy DPD will avoid the potential adverse impacts of additional recreational pressure and increased car use and waste water treatment. The guidance states ;

“The primary aim of the mitigation of an option should be to cancel out any adverse effects fully. Where it is not possible to eradicate negative effects completely, there should be a sufficient reduction so that an adverse impact on the integrity of the European site can be nullified.”¹¹

8.2. The plan preparation process, influenced by the Sustainability Appraisal (SA) has ensured that options are chosen which have sufficiently reduced the impacts of these significant effects that the Core Strategy impacts on integrity have been nullified. These options and policies include :

- Strategic Growth Scenarios (see para. 8.4 below)
- Final Masterplan (Policy CS2 Borough Wide Strategy)
- Transport (Policy CS15 Transport)
- Tourism (Policy CS17 Tourism)
- Rural Options (Policy CS6 Tenterden and the Villages)
- Infrastructure (Policy CS18 Meeting the Community’s Needs)

8.3. The AA of the Draft South East Plan stated that *“the potential effects can be controlled by the implementation of appropriate avoidance or mitigation measures at a regional or local level”* (para15.1.5). It proposed a number of mitigation measures for each of the key effects from the South East Plan. Those effects which relate directly to the Wye and Crundale Downs SAC and Stodmarsh SPA and SAC have been extracted in the following chapters.

8.4. As part of the Core Strategy plan preparation a total of 6 scenarios were considered. These are presented in the Greater Ashford Development Framework report (April 2005). Scenarios 1 to 3 provided the greatest variation in the delivery of the housing and employment numbers, while 4, 5 and 6 were variances of the preferred option 3. The three main scenarios were :-

- Scenario 1 – Suburban growth
- Scenario 2 – Linear Town
- Scenario 3 – Compact Centre

¹¹ ‘Planning for the Protection of European Sites : Appropriate Assessment’ (2006) para 5..17

- 8.5. Extracts from the SAR will be detailed in the following chapters in reference to recreational pressure, air quality and wastewater disposal. From these Strategic Growth Scenarios a Strategic Growth Model was prepared which included detailed options on the location of a substantial proportion of the housing requirement in the town. At each stage in the plan preparation 'Air', 'Biodiversity, Fauna and Flora', 'Tourism' and 'Water' (including wastewater) were assessed. The results of this were fed into the preparation of the Core Strategy and its policies. Extracts from the SAR will be detailed in the following chapters in reference to these significant effects.

9. Potential significant Effect 1 : Air Pollution

9.1. Adverse effects (or risk of)

- 9.1.1. Air pollution can have a range of impacts on European sites, including the following:

- SO₂ and nitrogen compounds can cause acidification of soils
- NO_x and ammonia can cause eutrophication
- Heavy metals can have a phytotoxic effect
- Ground-level ozone damages plants.

In the South East, air pollution affects European sites through Region-wide pollution caused by a wide range of sources, including from overseas; and local pollution, mostly caused by traffic, but also some industrial processes.

9.2. South East Plan Appropriate Assessment: Air quality – Mitigation

- 9.2.1. The AA of the Draft South East Plan identified an increase in car use as a significant factor which may lead to an increased level of atmospheric pollution and acidification of chalk grassland, and identified the air pollution deposition for the Wye and Crundale Downs and Stodmarsh. Mitigation measures proposed in the AA of the Draft South East plan for Air quality are detailed below.

The South East Plan should:

- strengthen Policy NRM7, which requires local authorities and other relevant bodies to “seek an improvement in air quality in their areas so that there is a significant reduction in the number of days of medium and high air pollution by 2026” to promote continual improvement, not simply improvement in 20 years;
- direct development to areas where the risk to European sites can be minimised;

- promote improved management of European sites experiencing nutrient enrichment, possibly through financial incentives for environmentally sensitive management;
- strengthen policies in Sections D5 and D4 to improve linkages with transport emissions, influencing investment in transport infrastructure management of public transport and demand management; and
- require all local authorities to balance out the air pollution emissions of any new development with corresponding reductions in air pollution elsewhere, to be “pollution neutral”. For instance, new development that is expected to generate amount x of air pollution could help support a reduction of x elsewhere in the authority, for instance through support of car-free developments, parking scheme or public transport. The balancing measures would need to be justified and be in place before the new development becomes operational. Such offsetting would only be acceptable where local air quality effects on European sites are not involved.

9.2.2. Other mitigation measures include avoidance options for reducing traffic levels on roads within 200 m of European sites that are sensitive to air pollution. Such measures include the restriction or exclusion of less clean vehicles. It also suggests a consistent region-wide approach where local level AAs could work to the same rules and assumptions. These are :

- the effects of increases in NO_x (and thus nitrogen deposition) on sensitive European sites that are located within 200 m of major roads may be significant;
- the effects of increases in NO_x (and thus nitrogen deposition) on European sites situated more than 200 m from major roads will be considerably smaller, but could potentially be felt on European sites over a much wider range;

9.3. Core Strategy Appropriate Assessment : Air Quality – Mitigation

9.3.1. At the earliest stage in the Core Strategy preparation, the Halcrow Report (2003) advised that Ashford’s growth should be transport-led. This was based on the knowledge that travel in Ashford is currently dominated by the private car; around 95% of journeys are undertaken by car compared with under 5% by bus and rail. The Sustainability Appraisal process identified a number of mitigation recommendations for atmospheric integrity and air quality which were taken forward in the preparation of the Core Strategy. These are shown below

Atmospheric integrity and air quality

“It is considered that Scenario 3 presents the best opportunities for access to local amenities, enabling facilities to be located close to where people live, thus reducing car use and increasing cycling and walking. This is

likely to contribute to better use of existing facilities and multi-functional neighbourhoods.”

Scenario 3 predicted to result in high density mixed use development, leading to significant decrease in modal share of car. Walking scores slightly higher than other scenarios. Mixed use development will reduce number of journeys necessary. However, combined with the increases in traffic which are anticipated as a result of growth, the impacts are likely to be neutral at best.

Impacts are closely related to traffic growth. No data on traffic growth is provided, thus conclusions are considered on the basis of modal split. It is considered that traffic growth will occur under all options, but that by facilitating sustainable modes of transport, fewer people will need to use cars, thus contributing towards achieving air quality targets.

Improvements and advances in vehicle technology is likely to contribute to reduced emissions per vehicle over time under all scenarios.

It will be important to ensure that increase industrial activity (for example in the manufacturing sector) does not have detrimental impacts on air quality.

Reduce the proportion of journeys made by the private car, and promote safe walking and cycling

Under Scenario 3, 14% reduction in share of car; 12% increase in public transport; 2% increase in cycling and walking remains the same. High density mixed use supports non-car modes.

- 9.3.2. A sustainable approach to transport was taken forward in the plan preparation, culminating in the policies set out in the Core Strategy submission document. The principles which guided the plan preparation illustrate how the Core Strategy will avoid any adverse effect from Ashford's growth on the Wye and Crundale Downs.
- Movement Networks
 - Mixed-use, more compact development
 - Reduce the need to travel by car
 - A walkable city
 - Human scale development
 - Active 'Living' Streets
- 9.3.3. The masterplan for Ashford (The Greater Ashford Development Framework (GADF) was also based in the design approach of 'Generative Urbanism' which focuses on the interaction of land use and movement. The approach is rooted in the belief that public transport accessibility in combination with walkability are the primary generators of urban form, and

by definition, urban activity. The approach exploits the potential of movement and creates new main streets for Ashford as the focus for local communities, creating a new sense of place and integrating development form. Scenario 3 was the preferred approach as it delivered these aims.

9.3.4. As a result of this the Core Strategy has set out a number of policies which will, in combination, avoid any adverse effects from air pollution on the SAC. These include :

- Policy CS1 A: Development that respects the environmental limits that protect the high quality built environment and natural environment of the Borough, minimises flood risk, provides for adequate water supply, and protects water and air quality standards.
- CS1 C: Protection for the countryside, landscape and villages from adverse impacts of growth and the promotion of strong rural communities.
- CS1 I: A wider choice of easy to use forms of sustainable transport to serve development that generates significant demand for movement.
- CS15 : Transport (see Core Strategy for policy wording)

9.3.5. Within the vision and the Core Strategy policies there are a number of key references which will reduce the use of the car, and thus air pollution and its predicted effects on the SAC. These include :

- Compact development and denser town centre.
- The use of sustainable transport
- High quality, high frequency public transport system in the new major Urban Extensions
- Mixed-use developments to provide a range of jobs alongside new housing development, thus reducing the need to travel.
- Prioritising the high street for pedestrians and cyclists.
- Provision of green spaces within and between developments to disperse air pollution.
- High frequency SMARTLINK public transport system to link the town centre and the international and domestic railway stations with the major peripheral growth areas.
- Achieving a level of modal change in transport patterns to enable Ashford to grow.
- Park & Ride facilities at the Warren, Waterbrook and Chilmington Green.
- Motorway improvements to existing junctions 9 and 10, and the creation of a new junction 10A

- New mixed use link roads
- New pedestrian and Cycle links
- Pedestrian/Cycle/Bus improvements
- Remodelling of the town centre ring road
- A Transport Strategy for Ashford has also been published.

9.3.6. The Annual Monitoring Report (AMR) also sets out a number of Core Strategy policy indicators to monitor policy implementations. A number of these indicators consider the impact of air pollution. These are :-

CS1 (L) Guiding principles & CS15 Transport :	Amount of new residential development within 30 minutes public transport time of: a hospital, a primary school; a secondary school, areas of employment; and a major retail centre.
	Annual average peak hour traffic flow on principal roads
	Cycling in Ashford

10. Potential significant Effect 2 : Recreational Pressure

10.1. Adverse effects (or risk of)

- 10.1.1. As the Wye and Crundale Downs is located within the wider Kent Downs Area of Outstanding Natural Beauty the tourism demand is part of the wider AONB offer. Within and adjacent to the Wye and Crundale Downs there is a number of existing recreational opportunities that vary from horse riding, cycling , walks , fishing , gliding and including the Wye National Nature Reserve.
- 10.1.2. The Wye and Crundale Downs itself is advertised as a location for a horse riding opportunities, linking the downland and woodland on the North Downs to the east of the Stour valley. The riding routes comprise two short and four long loops, utilising bridleways, byways and sections of quiet minor roads. Within Wye the North Downs Way is a National Trail which runs for 140 miles from Farnham in Surrey to Dover in Kent, passing through the Wye Downs.
- 10.1.3. In a survey completed in 2005 for the Mid Kent Downs (which the Wye and Crundale Downs is located within) the two highest factors for visiting the downs were to be in a relaxing environment and for the attractive scenery. Of those questioned 60.2% stated they will or have used their trip to go for walks within the area, 55.7% to visit a local visitor attraction. (Mid-Kent Downs In-Destination Survey, 2005).

10.1.4. Data from Natural England noted that the number of visitors to Wye NNR (including Wye Crown) is approx. 9,000 per annum. This includes visitors from the local area, from across Kent and tourists.

10.2. South East Plan Appropriate Assessment : Recreational pressure – Mitigation

10.2.1. The AA made a number of recommendations for the RSS to consider which include :

- Strengthening the approach to recreational provision
- Restricting development abutting those sites that are subject to recreational pressure
- The development of large new parks and other green areas, possibly as part of a 'green infrastructure' policy.
- Whether other forms of new and enhanced recreational space is needed.
- Promote multi-local authority working to assess whether recreational pressures are likely to have a significant impact, "where this is likely to be a problem, agree and implement a S106 funding regime for improved habitat management where appropriate, and where this is unlikely to preserve site integrity, assess and implement the provision of alternative recreational space where appropriate".
- Promote access management in European sites

10.3. Core Strategy Appropriate Assessment : Recreational pressure – Mitigation

10.3.1. The Sustainability Appraisal process identified a number of mitigation recommendations for recreational pressure which were taken forward in the preparation of the Core Strategy. These are shown below

Recreational pressure

in respect of access to parks and areas of open space Scenario 3 is expected to outperform other options as under Scenario 3 the ratio of households to public green space is approximately 52 households per hectare of public greenspace. While the availability of local amenity greenspace is less than under Scenario 2 the size of the regional parkland (which could also support amenity functions) is increased to 400 ha.

10.3.2. The Core Strategy sets out how the growth of Ashford will provide the necessary services and infrastructure to provide for the recreational needs arising from development. The visions supported by the policies will, in combination, avoid any adverse effects from recreational pressure. These include :

- Policy CS1 B: The conservation and enhancement of the historic environment and built heritage of the borough
- Policy CS1 G: The timely provision of community services and other local and strategic infrastructure to provide for the needs arising from development
- Policy CS1 K: The creation of an integrated network of green spaces to provide a framework for growth – helping to serve the recreational needs of the community, enhancing biodiversity and providing green routes for pedestrians and cyclists.
- Policy CS 17: Tourism
- Policy CS 18 : Meeting the Community’s Needs

10.3.3. Within these policies key pieces of infrastructure are proposed, which will reduce the recreational pressure on surrounding protected sites. These include :

- Green Necklace: a green corridor connecting the Julie Rose stadium in North Ashford to the proposed Great landscape Parks in South Ashford.
- Great Landscape Parks : the creation of a Discovery Park as a "people’s park" for open-air events and recreation, and a Wetlands Park as a natural, uncultivated landscape
- Exhibition facilities
- Potential location for a Kent Multi-Use Commercial Events Arena/Conference Centre.

10.3.4. The Core Strategy also indicated the intention (para14.12 of the Core Strategy, 2006) to prepare a Green and Blue Grid strategy to be adopted as a Supplementary Planning Document (SPD). The SPD will set out how Ashford will provide for multi-functional greenspace uses; this includes providing an enhanced recreational and cultural experience. The delivery of the SPD will, in combination with the above Core Strategy policies help to meet the recreational needs of the growing town and reduce any indirect impacts that may occur on the Wye and Crundale Downs.

10.3.5. The Annual Monitoring Report (AMR) set out a number of Core Strategy policy indicators to monitor policy implementations. A number of these indicators consider the provision of leisure and tourism opportunities.

CS1 (H,L) Guiding Principles & CS17 Tourism	Amount of existing tourism facilities lost (unless satisfactory replacement facilities are provided) and new tourism
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	facilities gained as a result of new development
CS1 (G,H,L) Guiding Principles , CS8 Infrastructure Contributions & CS18 Meeting the Community's Needs	Amount of existing public recreation, sports, children's play, leisure, cultural , school and adult education, youth, health, public service and community facilities lost (unless satisfactory replacement facilities are provided) and gained as a result of new development.
CS1 (G,K) Guiding Principles & CS18 Meeting the Community's Needs	Amount of Open Space meeting standards set out in the Open Spaces Strategy

11. Potential significant Effect 3 : Wastewater disposal

11.1. Adverse effects (or risk of)

11.1.1. The AA of the Draft South East Plan identified the nature of water and its quality on European sites. It indicated how the quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts including:

- Immediate death of aquatic life through high levels of toxic chemicals and metals, and detrimental effects even at lower levels.
- Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion.
- Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.

11.1.2. It highlighted that water quality may be indirectly altered as a result of urbanisation from a number of factors, this included:

- Waste-water treatment effluent introducing water of different chemical characteristics
- Pollution from waste-water treatment effluent carrying increased pollutant loads , and
- Waste-water effluent carrying increased nutrient load, increasing the risk of eutrophication.

11.2. South East Plan Appropriate Assessment : Wastewater disposal – Mitigation

11.2.1. The AA in assessing the effects of wastewater effluent discharges states that they have not been able to conclude that there will be no adverse effect upon the integrity of European sites (para 6.5.4 of AA of Draft South East Plan, 2006). Stodmarsh SAC was one of these European sites for which it was not possible to conclude no adverse effect due to increased effluent discharge associated with developments under the South East Plan, either alone or in combination with other plans and projects.

11.2.2. To avoid and mitigate against potential effects therefore the AA of the Draft South East Plan highlighted policy NRM1, and the Environment Agency's consent regime which already helps to ensure that water quality is maintained, particularly at European sites. The Water Frameworks Directive will further support this. The AA stated "In most cases, this should ensure that the integrity of the European sites is not affected" (para6.6.2). It highlighted that

"Local authorities must ensure that detailed proposals and site allocations in their LDFs take account of the limits of existing sewerage treatment works. In addition, AA should be carried out at a more local level where sewage or run-off from proposed developments could have a significant impact on the integrity of a European site."

11.3. Core Strategy Appropriate Assessment : Wastewater disposal – Mitigation

11.3.1. Within the Sustainability Appraisal (SAR, 2006) process waste water infrastructure and water quality were discussed. Criteria 2.13 highlighted 'The LDF will introduce a range of measures for wastewater treatment', and 2.14 'The LDF will ensure that the rate of growth is commensurate with wastewater treatment infrastructure capacity'. In appraising the 3 scenarios it stated

Under Local retention ponds and reed beds are possible drainage options and lower densities may generate opportunities for natural wastewater treatment options and river and floodplain engineering.

11.3.2. Mitigation recommendations stated "Wetland creation requires more detailed consideration and the links to wastewater treatment potential & SUDs should be explored further. The results from the B&V report/IWMS should be integrated into plan development.", and "The potential for local, decentralised water treatment infrastructure (relating to both surface water run off and household waste water) should be given additional consideration as part of plan development".

11.3.3. The Core Strategy has through Policy CS21 Water Supply and Treatment and CS18 Meeting Community Needs identified the need for an enhancement and increase, where appropriate of waste water

infrastructure. This will reduce the adverse effects and potential significant effects on the Stodmarsh SPA as a result of Ashford's growth.

- 11.3.4. Policy CS21 has been generated from the Ashford Integrated Water Management study (IWMS). The Core Strategy highlighted that given the scale of growth proposed in Ashford the existing Bybrook Waste Water Treatment Works (WWTW) may need to be expanded or, alternatively, it may be appropriate to create new WWTWs elsewhere in Ashford. It states that an appropriate site will be identified in the Urban Sites and Infrastructure DPD to ensure that the appropriate waste water infrastructure is implemented alongside the growth of the town.
- 11.3.5. The IWMS also set out a number of actions which included an upgrade of the WWTW, an Ashford River Health Toolkit, and the funding of water supply and wastewater infrastructure.
- 11.3.6. The Core Strategy has taken account of the limits of existing sewerage treatment works and has stated that "*New development must ensure that there are no direct or indirect adverse effects on the quality of water supplies*" (para15.24). These mitigation measures comply with those in paragraph 6.6.5 of the AA of the Draft South East plan in paragraph 6.6.2.
- 11.3.7. Therefore, the Core Strategy has set out a number of policies which will, in combination, avoid any adverse effects from waste water disposal on the SAC and SPA.

12. Implications for future Development Plan Documents

- 12.1. Subsequent Local Development Documents (LDDs) as part of the LDF will provide further opportunities to avoid and further mitigate the impacts above. The key LDDs are :-
 - Tenterden and Rural Sites Development Plan Document (DPD) : This DPD deals with key rural sites allocations, primarily for residential development and with the settlement of Tenterden will pull together the policies and proposals for the area in one document. The document is scheduled for a preferred options stage in September 2007, with a view to adopt the document in April 2009.
 - Green Spaces and Water Environment Supplementary Planning Document (SPD) : This document will identify , promote and aid the implementation of opportunities for recreation within the growth of Ashford.
 - Urban Sites and Infrastructure DPD: This document will identify the land for housing and employment development, and identify the key pieces of infrastructure that the town needs. Within this document it is expected to identify the locations of the recreation and transport infrastructure detailed above, which, in combination

reduce any adverse effects on the Wye and Crundale Downs SAC. These include the Great Landscape Parks, SMARTLINK, and wastewater infrastructure.

13. **Conclusion**

- 13.1. Potential significant effects on the integrity of the Wye and Crundale Downs SAC and Stodmarsh SPA and SAC in combination with other plans and policies were identified. In any event there are no alternative solutions which would not result in the Core Strategy being inconsistent with Regional Planning Guidance 9, and the Draft South East Plan.
- 13.2. The Core Strategy has ensured that mitigation is included and that there is sufficient reduction in the identified potential negative effects that an adverse effect on the integrity of the European site can be nullified¹². These include sufficient land for recreation to reduce the recreational pressure as a result of growth, sufficient measures to increase the use of sustainable transport modes and wastewater infrastructure and measures to enhance the quality of wastewater disposal. Mitigation measures will also be taken forward in subsequent Local Development Documents (LDDs).
- 13.3. There are therefore no negative effects on the integrity of the Natura 2000 sites by reason of the mitigation measures in the Core Strategy.

¹² 'Planning for the Protection of European Sites : Appropriate Assessment' (2006) para 5..17