

Date: 09 April 2018  
Our ref: 243524  
Your ref: -



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**By email only, no hard copy to follow**

Dear Simon Cole

### **Ashford Local Plan Habitats Regulations Assessment**

Following my telephone conversation with your colleague, Catherine Hughes, last week I understand that the Inspector for the Local Plan examination has sought clarity in relation to the findings of the Habitats Regulations Assessment. In the subsequent email of the 5 April, I understand that the Inspector has specifically sought clarity on the following:

*'The SoCG with Natural England makes no reference to the updated HRA (SD11) which was done at their request to reflect the Wealden judgment. Would it be possible to ascertain before the hearing whether NE share the conclusion at para 5.8 of the HRA?'*

In relation to the potential for traffic generated air quality impacts that could occur to the Wye and Crundale Downs Special Area of Conservation (SAC), Natural England is satisfied that, given the rural location of the site and the nature of the roads in close proximity to the SAC (being narrow country lanes), there are unlikely to be significant increases in traffic flow or implications for the SAC from air quality as a result of the Local Plan and a likely significant effect can be ruled out.

For the Dungeness, Romney Marsh and Rye Bay Wetland of International Importance under the Ramsar Convention (Ramsar Site), Natural England notes that the Habitats Regulations Assessment does not include information on the existing levels of traffic on roads within close proximity to the proposed Hamstreet allocations (S31, S32 and S57). Similarly, no detailed information has been provided on the likely increase in traffic (and potential impacts from traffic generated air borne pollutants to habitats and species within the Ramsar Site) from these allocations. However, the proposed policy wording for these three sites requires an environmental impact assessment to be provided at the planning application stage which will need to consider all potential environmental impacts, including ecological and air quality impacts. Natural England therefore considers that there is sufficient policy protection in place at the Local Plan level to concur with the findings of the Habitats Regulations Assessment at this stage. That is there are unlikely to be significant effects to the Ramsar Site based upon the best available evidence. Of course, as the detailed applications come forward, this will need to be revisited as part of the environmental assessment process and where necessary, detailed avoidance and mitigation measures implemented, all of which are covered by the proposed policy wording.

I trust these comments are helpful and please do not hesitate to contact me if I can be of any further assistance.

Yours sincerely

[REDACTED]

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