Comments

Site Specific Part 2 Local Plan - Publication Plan Consultation (18/12/19 to 12/02/20)

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Response Date 12/02/20 08:24
Consultation Point Site Specific Part 2 Local Plan- Publication Plan (View)
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Representation

Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?

Site Specific Part 2 Local Plan - Habitats Regulations Assessment (HRA)

Tests of Soundness

Do you consider the Local Plan is sound in terms of being:

Justified
Effective
Positively prepared
Consistent with National Policy

Reasons

Please give the reason(s) why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate.

1. The HRA conclusion in section 6 (page 26) is based on the assumption that golden plover fly 4km away from the SPA. However, it is known that golden plover can fly up to 15-20km away from the SPA. Therefore impact needs to reasonably assessed using this distance criteria. Until this assessment has taken place, we disagree with the conclusions of the HRA, and advise that your justifications are revised.

2. This information comes from Natural England's evidence-based Impact Risk Zones. The IRZs covered in our guidance aims to protect the SSSIs and their designated bird populations, as afforded by Part II of the Wildlife and Countryside Act 1981 (as amended) and through the Conservation of Species & Habitats Regulations 2017 (as amended); for those SSSIs that are also classified as Special Protection Areas (SPAs). Note that two factors are taken into consideration when deciding on appropriate
IRZs for SSSIs designated for bird populations: the Potential Impact Distance of development and the extent of Functionally Linked Land used by designated bird populations.

Notifications

Do you wish to be notified?