

Comments

Main Modifications to the Local Plan (18/02/19 to 01/04/19)

Comment by	MR Mark Nowers (RSPB) (1208238)
Comment ID	197
Response Date	01/04/19 10:31
Consultation Point	Policy ENV 03 The Brecks Protected Habitats & Species (View)
Status	Processed
Submission Type	Email
Version	0.2

**Do you consider the proposed modification is:
(please mark the appropriate box)**

**If you consider the proposed Main Modification
to be UNSOUND, please identify which test of
soundness your representation relates to?**

**Please give us details as to why you think the Local Plan with proposed modifications is NOT legally
compliant or sound?**

MM119 – the RSPB supports the included reference to buffer zones around the SPA.

With regards to the added 4-line paragraph on page 108, we suggest that it just reads “Within these areas development may be brought forward, providing a project level Habitats Regulations Assessment can demonstrate adverse effects have been prevented.” We do not consider it is necessary to provide an example as this should be evident to those with expertise in the HRA process.

How would you like to be notified?

Comment by	MR Mark Nowers (RSPB) (1208238)
Comment ID	195
Response Date	01/04/19 10:24
Consultation Point	5.13 Paragraph (View)
Status	Processed

Submission Type Email
Version 0.5

**Do you consider the proposed modification is:
(please mark the appropriate box)**

**If you consider the proposed Main Modification
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soundness your representation relates to?**

**Please give us details as to why you think the Local Plan with proposed modifications is NOT legally
compliant or sound?**

MM118 – the RSPB supports that policy ENV02 will be called “Biodiversity protection and enhancement. That sets out a positive tone for which the council should be commended. This is consistent with national planning policy.

With regards to the amended text in paragraph 5.18, the RSPB supports the inclusion of the text relating to the Habitats Regulations Assessment.

We support the inclusion of the underlined wording setting out that proposals should be consistent with the Habitats Regulations (page 104).

We support the reference to the mitigation hierarchy which has been included (page 105).

How would you like to be notified?

Comment by MR Mark Nowers (RSPB) (1208238)
Comment ID 193
Response Date 01/04/19 10:17
Consultation Point 5.11 Paragraph ([View](#))
Status Processed
Submission Type Email
Version 0.3

**To which proposed Main Modification does your representation relate? Please state the relevant
reference number that you are commenting on from the Schedule of Proposed Main Modifications
e.g. MM1**

MM15 - Green infrastructure map supporting map, after para 5.11

**Do you consider the proposed modification is:
(please mark the appropriate box)**

**If you consider the proposed Main Modification
to be UNSOUND, please identify which test of
soundness your representation relates to?**

Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?

the RSPB supports the inclusion of the Green Infrastructure map.

How would you like to be notified?

Comment by	MR Mark Nowers (RSPB) (1208238)
Comment ID	192
Response Date	01/04/19 10:16
Consultation Point	Policy GEN 05 Settlement Boundaries (View)
Status	Processed
Submission Type	Email
Version	0.5

**Do you consider the proposed modification is:
(please mark the appropriate box)**

**If you consider the proposed Main Modification
to be UNSOUND, please identify which test of
soundness your representation relates to?**

Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?

the RSPB supports the amendments made to this policy and consider that it is consistent with national planning policy.

How would you like to be notified?

Comment by	MR Mark Nowers (RSPB) (1208238)
Comment ID	191
Response Date	01/04/19 10:15
Consultation Point	GEN 1 - Sustainable Development in Breckland (View)
Status	Processed
Submission Type	Email
Version	0.3

**Do you consider the proposed modification is:
(please mark the appropriate box)**

If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?

Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?

the RSPB does not support this amendment and consider that it would not be consistent with national planning policy (para 174) which clearly states that biodiversity should be "protect(ed) and enhance(d)". The existing wording should be retained and the underlined or where possible removed. This would also be consistent with MM118 as set out by the Council

How would you like to be notified?

Comment by	MR Mark Nowers (RSPB) (1208238)
Comment ID	190
Response Date	01/04/19 10:11
Consultation Point	Figure 1.1 Breckland Key Diagram (View)
Status	Processed
Submission Type	Email
Version	0.2

**Do you consider the proposed modification is:
(please mark the appropriate box)**

If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?

Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?

The RSPB supports the amendments made to the map (inclusion of 1km orange cells) and consider it is consistent with the HRA.

How would you like to be notified?