

Filtered Data Export

Full name: Helen Booker

Organisation (where relevant): RSPB

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB04

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: Policy relating to vehicle emissions impacting on designated sites states: Development will not be permitted where there is potential for increased vehicle numbers, applying a precautionary approach, resulting in unacceptable increases of emissions of nitrogen oxides (NO_x) and/or ammonia (NH₃), or other polluting emissions falling on designated sites. The word 'unacceptable' has been added since the first consultation, enabling some increase in emissions, but with no definition of what is acceptable. This has weakened the policy. This is of particular concern as poor air quality is already negatively affecting the Pebblebed Heaths as identified in NE's Site Improvement Plan because of nitrogen deposition exceeding critical loads. Specifically in relation to the Pebblebed Heaths, the policy recognises that developments will lead to extra traffic on roads crossing the heaths and therefore an increase in emissions and that these will exceed threshold levels of harm. The break clause identified for the Pebblebed Heaths allows for a net increase in emissions from traffic where "there is sufficient headroom and there will be no deterioration in site quality as a result of the proposal." As an air quality mitigation strategy is not yet in place, there is currently no guarantee of, or evidence for 'headroom'. The HRA concludes it is not possible to rule out adverse effects on site integrity in relation to air quality and the heaths SAC/SPA.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Replace the words 'unacceptable increases' with '...adverse impacts on the designated features resulting from emissions of...'. The wording of the policy in relation to development

within 400m of the Pebblebed Heaths SPA/SAC similarly should replace 'unacceptable' with 'adverse'. We recommend the council works with Natural England to ensure the policy wording in relation to designated sites is correct.

Full name: Helen Booker

Organisation (where relevant): RSPB

Other party name (if relevant):

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Proposal:

4. Development at the West End

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

1(b). Does your comment relate to one of the changes listed above?: No

1(c). If the comment is related to a site, please state the site reference here.:

Marlcombe

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

SANG provision is based on the first 8,000 homes with a further 2,000 planned for the future, and therefore a requirement for a further 37.6ha of SANG. To comply with the policy, the plan should include wording to ensure that suitable land will be available for this additional SANG. The HRA raises issues over the proposed location and design of the SANG (shown in figure 7) for the first 8,000 homes and its ability to deliver its core role in providing an alternative recreation area to the Pebblebed Heaths and Exe Estuary SPAs, especially for dog walkers. The masterplan must ensure that SANG provision is appropriately sited and designed to ensure it acts as an effective interceptor site for recreational use, especially dog walking, and such that dogs can run freely without coming into conflict with other users and wildlife. Monitoring will be essential to ensure the measures are effective and adjusted as needed. Location of SANG should also consider flood risk and ensure that the full area and attractiveness of SANG is maintained and available all year round.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Inclusion of wording to ensure that suitable land will be available for the future provision of SANG requirements for the additional 2,000 homes, in order to comply with the policy

regarding taking into account the infrastructure needs of future development. Review the location and design of SANG provision to ensure that the area will meet its requirements in providing a year round attractive alternative to the SPAs especially for dog walking.