

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>HRA of the SALP (Reg 19)</i>				
<i>HRA of the SALP (Reg 19)</i>				
24936 - Elveden Farms Ltd. [13111]	Comment	RPS CgMs on behalf of Elveden seek to object to the Habitats Regulations Assessment of the Site Allocations Local Plan on the basis that the material included within it makes little or no reference to the inclusion of the development at Little Eriswell (REF. DC/16/1360/FUL).	<p>The proposal for development at Little Eriswell is not allocated in the SALP. This development is included in the list of other projects in Appendix 2 and used information available at that time. Any future iteration of the HRA will update this table.</p> <p>Responses to detailed concerns are provided below:</p> <p>The HRA screening methodology applied in these paragraphs was agreed with Natural England. It is based on the principle of development within the allocated boundary rather than a specific proposal and only takes account of mitigation provided by the adopted Core Strategy and emerging SIR and SALP. The approach to consideration of more detailed evidence available from any project level HRA that has already been carried out is described at paragraph 7.3.</p> <p>In relation to site SA7(b), FHDC completed a project level HRA in 2014 but stated that this would need significant updating to ensure it is fit for purpose; the HRA of the SALP did, therefore, not rely upon it. As set out in Table 7.2, Appropriate Assessment for this site allocation was able to rule out an adverse effect on the integrity of Breckland SPA.</p> <p>Both paragraph 6.30 and the following boxed HRA screening conclusion state that likely significant effects on Breckland SPA due to recreation pressure can be ruled out.</p> <p>New development would be required to make a proportionate contribution to mitigate in-combination recreational effects on the SPA</p> <p>Table 7.2 - comments noted</p>	No action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24883 - Natural England (Cheshire) (Ms Francesca Shapland) [12637]	Comment	Habitats Regulations Assessment We are pleased that our previous comments from the HRA screening stage have evidently been taken into account within chapters 1-5 of the current HRA and agree with the conclusions of the Appropriate Assessment, Chapter 7. However we consider that in order to ensure the HRA is robust, issues relating to recreation need further explanation and we again highlight a point we made in our previous advice, that the screening criteria would benefit from review.	<p>Noted. Responses to detailed concerns are provided below.</p> <p>Recreation - in response to this comment, proposed changes to the methodology for future iterations of the HRA of the SALP are provided under the heading 'Recreation' in LUC's letter to Natural England of 23 May 2017. These have been agreed by Natural England, as confirmed in the Statement of Common Ground.</p> <p>Air Quality - comments noted</p> <p>Screening criteria - In response to this comment, proposed changes to the methodology for future iterations of the HRA of the SALP are provided under the heading 'Screening criteria' in LUC's letter to Natural England of 23 May 2017. These have been agreed by Natural England, as confirmed in the Statement of Common Ground.</p> <p>Table 7.1 - comments noted</p> <p>Table 7.2 - In response to this comment, proposed changes to the methodology for future iterations of the HRA of the SALP are provided in LUC's letter to Natural England of 23 May 2017</p>	Modifications to require measures to mitigate recreational effects to stone curlew on farmland have been proposed. These have been agreed by Natural England, as confirmed in the Statement of Common Ground.
24721 - Hills Residential Ltd [12651]	Comment	Whilst it is FHDC's choice to allocate sites, this must be based on the most appropriate sites coming forward and a consistent assessment. Continuing to decline to allocate site RL/07 for impact on Stone Curlew when a full assessment has been provided to demonstrate it will not impact on Stone Curlew (which is now supported by Natural England - see Appendix 2) is unacceptable and contravenes requirements for positive plan preparation, a justified plan and a plan which is consistent with national planning policy. To address this, site RL/07 should be allocated.	The HRA of the SALP did not assess site RL07 because FHDC are not allocating it.	no action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24939 - RSPB - Eastern England (Mr Mike Jones) [6257]	Comment	We strongly support the Recreation Mitigation and Monitoring Strategy in order to address recreational pressures on European sites from the new housing allocations. However, as the plan needs to be able to anticipate and mitigate any recreational pressures before they become adverse, especially given research has identified a projected increase in visitor pressure of 30% on the Breckland SPA as a result of the adjacent Local Authority's housing plans, we strongly recommend that the monitoring proposals in the Strategy are made a core and regular feature, as per the approach taken in neighbouring authorities' plans.	Comments noted	no action required
