



Our Ref: [REDACTED]

9th August 2019

Kerry Trueman
Programme Officer Solutions Limited
32 Devonshire Place
Prenton
Wirral
CH43 1TU

By email & post

Dear Ms Trueman

ALLERDALE LOCAL PLAN EXAMINATION PART 2 – HABITAT REGULATIONS ASSESSMENT – LOCAL PLAN SITE ALLOCATIONS (2018) WITH UPDATES - JULY 2019

Further to your email of 24th July I write on behalf of Thomas Armstrong (Construction) Ltd to set out our comments on the track changes updated HRA (July 2019).

Our comments are made against the backdrop of the earlier Advice Note provided by Walker Morris raising concerns with the September 2018 version of the HRA.

There are still concerns we have with the track change update (July 2019) version and these are set out below.

Firstly, we note that WYG state on page 13 (3rd paragraph down):

“In relation to a Plan HRA, WYGs approach has been extremely robust, incorporating site walkovers for every site investigated during the selection process. This has enabled the provision of ongoing advice to ABC on the ecological constraints for each site considered....”

The site walkovers do not appear to be included anywhere in the evidence base before the Examination and clearly the conclusions reached by WYG from their walkovers are important in understanding the views reached in the context of the HRA for individual sites and resulting conclusions drawn.

For the Part 2 Site Allocations Plan to be “sound”, we consider these walkover assessments should be made available as part of the Council’s public consultation on the plan and consequently a focussed consultation should be undertaken of the walkover findings.

Secondly, we note that in the document WYG comment that the mitigation proposed in the HRA is sufficient because it makes clear that project based HRA’s will be carried out.

Table 2 (page 44) provides the Screening Matrix for Site Allocations. The final column includes requirements under the heading ‘Residual Effects’. In a number of cases the recommended action is that “Project Level HRA required”.

The HRA is not a policy document itself and therefore cannot incorporate a development plan policy requirement for project based HRA's to be undertaken for specific allocations.

In our view, this requirement should either be reflected in the site specific allocation policies and this is not the case or included in more general terms in an emerging policy.

In our view amendments should be made to the emerging plan, either by updating the site allocations to reflect the HRA recommended approach to provision of Project level HRA's or by inclusion of the reference to the need for HRA's in a general policy.


For the sake of clarity we would suggest the need for project based HRA's should be incorporated into the site specific allocations, where relevant.

These changes are required, in our opinion, for the plan to be 'Effective' and 'Consistent with National Policy' in the context of conserving and enhancing the natural environment.

Having reviewed the track change updated HRA (July 2019) we consider that further amendments are required to the submitted Allerdale Local Plan (Part 2) Site Allocations document as outlined above in order for the Plan to be found "sound". The amendments should be subject to a further focussed consultation.

We trust these comments will be taken into account.

Yours sincerely


Jeremy Williams BA (Hons) MA MRTPI
Director