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Our ref:98741



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Dear Peter,

Allerdale Local Plan Pre-Submission Draft and Habitats Regulations Assessment – Proposed changes

Thank you for your recent e-mail, dated 20 September, relating to the above, which includes revisions to the Habitats Regulations Assessment (HRA), Appendices C, D and E and the Local Plan Submission Draft.

The proposed changes follow a meeting between Natural England and Allerdale Borough Council on 19 August 2013, where we discussed Natural England's concerns with the pre-submission draft of the plan; in particular our view that certain issues in the HRA had not been adequately addressed as set out in our statutory consultation response dated 10 July 2013.

Natural England are satisfied with the changes that have been made and are of the opinion that Allerdale Local Plan has gone as far as possible at this strategic level to provide protection for Natura 2000 sites.

On this basis, **Natural England confirms that our previous concerns have been adequately addressed and we would no longer consider the Plan unsound with respect to the Habitats and Species Regulations 2012 (as amended).**

The HRA, however, has highlighted some important issues that could not be adequately assessed at this stage of the plan process due to uncertainty associated with a high level strategic Plan. We strongly encourage the Local Planning Authority to consider the following issues, which would benefit from further investigation/assessment to assist project level proposals and/or lower tier documents:

Renewable Energy and Low Carbon Technologies

Policy S19 now contains greater protection for Natura 2000 sites, however the HRA has outlined that, depending on the location of future turbines, there could be effects on designated sites. This is an example of 'implementation uncertainty' as it is not clear at the strategic level where wind turbine development will occur. It would be beneficial to consider this issue in further detail in terms of communicating with neighbouring authorities and considering whether further information/evidence should be sought to assist the assessment of planning applications at project stage. It may be beneficial to consider producing a Supplementary Planning Document/planning

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guidance on this subject which would be a useful tool for developers. To begin the process it would be worthwhile gathering evidence and best practice already available before undertaking any research yourselves, for example a similar approach has been taken in Dumfries and Galloway. Natural England are happy to advise further on this.

Recreational Pressure

This needs careful consideration at site allocations stage and ABC need to be confident that they can accommodate development without causing an increase in recreational pressure on sensitive Natura 2000 sites.

Air Quality

Again, this will require consideration at site allocations stage and ABC need to be satisfied that they can accommodate development without having to rely on land surrounding the roads highlighted as having above critical levels of nitrogen and acid deposition (A66, A591 and A595 corridors).

Water supply/Waste water

This needs to be a watching brief, as information becomes available on the progress of the new infrastructure this needs to feed into the decision making process at allocations stage. Natural England is pleased to note that amendments have been made to Policy S3 supporting text, which clearly outlines that infrastructure provision must be in place prior to development to ensure no impact to designated sites.

If I can provide any further advice relating to this consultation, please do not hesitate to contact me. For all other correspondence, please contact the address above.

Yours sincerely

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