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Dear Mr Hirst

**Ribble Valley Borough Council: A Local Plan for Ribble Valley 2008-2028
Publication of the Ribble Valley Housing and Economic Development –
Development Plan Document (DPD)**

Thank you for your consultation on the above, which was received by Natural England on 28th April 2017.

With specific reference to the Habitats Regulations Assessment (HRA) Natural England would like to summarise that more information and explanation is required on how the conclusion of No LSE has been reached.

The HRA states:

5.1 Overview

5.1.1 Each proposed development allocation has been checked for the likelihood of it leading to a significant effect on a European site, either alone or in-combination with other allocations within the same DPD or with other plans or projects. The detailed screening of the Ribble Valley HED DPD in relation to the European sites is presented in Table 7. Table 8 provides a summary of the screening in reference to the allocation sites.

However these tables do not show the individual allocations. There are no plan/site references included. This information needs to be included in order to be able to identify individual allocations and see how the conclusions have been reached for all the sites.

The HRA continues:

*5.2.6 It is assumed that all allocation sites with planning permission have already gone through the planning process and appropriate mitigation/ compensation put in place to ensure no likely significant effects on European sites. All of the allocation sites with planning permission would have been required to adhere to the avoidance/mitigation measures included within the Adopted Core Strategy. This includes Key Statement EN4 which provides for ensuring that negative impacts upon biodiversity through development are avoided (refer to **Section 3.7**). Natural England would like to see more explanation to support this.*

Section 5 covers In Combination effects and states:

5.3.2 It is considered unlikely that there would be significant in-combination effects on European sites as a result of the development of the employment, housing and preferred option allocation sites listed with Ribble Valley HED DPD. In all instances where HRA has been undertaken, it was determined that there would be no significant effects on European sites either alone or in-combination with other plans or projects inside or outside of Ribble Valley. Natural England would like to see more evidence and explanation to support this conclusion.

The following paragraph taken from the HRA is placing reliance on any effects that are identified at project stage will be dealt with via a project level HRA. Natural England advises that further detail should be provided to explain how impacts can be avoided and/or mitigated at this stage. This will give a higher level of confidence that the allocations can be developed without resulting in LSE on European sites and are therefore deliverable.

5.3.3 The only sites where in-combination effects cannot be ruled are those which have not yet been through the planning system [i.e. the option sites]. However, in order to comply with Key Statement EN4 within the Core Strategy, projects with the potential for significant effects upon a European site would require a project-specific HRA, and therefore any in combination effects that could arise from these developments would need to be appropriately mitigated in order for planning consent to be granted.

Before Natural England can agree with the conclusions reached, we would like to see more evidence and explanation to support the view of the conclusions of the HRA are robust enough to ensure that the proposals are unlikely to have any significant effects on the European Sites identified, either alone or in combination with any other plans and projects.

All the allocations need to be individually identified in the HRA and specifically in tables 7 and 8. We recommend that you send a clear map with all the allocations and their references so there is a clear audit trail that they have all been assessed both alone and in combination.

Natural England would be happy to be consulted informally on a further draft HRA, or discuss this further if this would be helpful.

For any queries relating to the specific advice in this letter only please contact Kate Wheeler. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely