

Part B – Please use a separate sheet for each representation

Name or Organisation: **NATURAL ENGLAND**

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	Strategic Allocation Policy PS34 Sharpness Docks	Policies Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	✓	No	
4.(2) Sound	Yes	✓	No	
4.(3) Complies with the Duty to co-operate	Yes	✓	No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Natural England notes and agrees with the HRA report conclusions regarding this allocation (included below for reference). We note and welcome the suite of mitigation measures described as part of the requirements for the development at paragraph 3.5.11 of the Reg 19 local plan. We therefore regard the Reg19 plan and its HRA as sound and legally compliant in respect of the strategic development proposal.

Para 6.4.1 from HRA report:

'These requirements can be incorporated into the site design and checked at planning application, through project-level HRA. They will be sufficient to address risks relating to recreation impacts and the Severn Estuary SAC/SPA/Ramsar from PS34 site alone. It will also be necessary for the development to contribute to the strategic mitigation scheme to ensure in-combination effects of the development are addressed, with mitigation measures therefore being secured beyond the Sharpness Docks area. With these measures secured and implemented, adverse effects on-integrity can be ruled out, alone or in-combination.'

And Para 9.7:

'For the two Sharpness allocations PS34 and PS36, mitigation measures have been incorporated into the Plan and these will be secured at project level. These measures ensure localised impacts resulting from large amounts of new housing in a single location are addressed. Alongside contributions towards the updated Severn Estuary strategic mitigation scheme these measures will be sufficient to address risks relating to recreation impacts and the Severn Estuary SAC/SPA/Ramsar and ensure adverse effects alone or in-combination are Addressed'.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/a

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

