



# Craven Local Plan Examination

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## Summary of Representations on the Habitats Regulations Assessment and the Sustainability Appraisal and Craven District Council Responses Where Required

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09/05/2019



MM Ref	Representor	Summary of Key Issues Identified in the Representation	CDC response (where required)
SA	Natural England 051	<p>Natural England notes the updates to SG064 in modification MM39. Natural England has an outstanding objection on a planning application coming forward on this site (ref. 62/2017/18064). In addition Natural England advised that the Sustainability Appraisal should set out the overriding sustainability for selecting this site and include an assessment of alternative sites and why this is the most sustainable site. They are unclear whether this has been addressed.</p> <p>Natural England has no further comments to make regarding the Sustainability Appraisal.</p>	<p>The SA ( Doc Ref EL6.005b) accompanying the Schedule Main Modifications for consultation set out the overriding sustainability for selecting this site including an assessment of alternative sites and reasons why this is the most sustainable site, but it would appear that Natural England for whatever reason missed it. Craven DC have directed Natural England towards where the document can be found.</p>
HRA	Natural England 051	<p>Natural England welcomes the updated Habitats Regulations Assessment.</p>	<p>No response required.</p>
HRA	RSPB 020	<p>Golden plovers nest on the moors and blanket bogs of the North Pennine Moors SPA but do most of their feeding on surrounding pastures. They do not nest on the pastures but will sometimes take their chicks up to 2 kilometres (km) to feed on farmland. They occupy the pastures (and the moors) from late February to late July, but mid-March to June is when they are used most.</p> <p>No information has been provided on survey area, methodology, results/data and surveyor information of the mentioned surveys, field reports and data. Based on the lack of information provided and uncertainty whether the appropriate methodology has been used at the correct time of year. So unless bespoke surveys of Golden Plovers have been undertaken during the night from mid-March to late June, as well as during the day for females, it currently</p>	<p>There is no claim in the HRA document that the surveys referred to were detailed and thorough. There has been no requirement from Natural England to undertake the surveys in the detail put forward by the RSPB. Natural England has expressed satisfaction with the HRA document, including in relation to the aforementioned sites. There is no evidence of protected bird species from the North Pennines SPA inhabiting the northern Skipton sites from the information provided by the Ecological Data Centre during the site selection process.</p> <p>The RSPB put forward no evidence to support their claim of “inaccurate assumptions” regarding the potential suitability of sites. A previous representation from the RSPB (between the publication and</p>

	<p>cannot be ascertained that golden plover do not utilise the proposed allocation sites highlighted as being potentially suitable for foraging and it cannot be ascertained there will not be an impact on the SPA.</p> <p>It is also acknowledged that photography of a number of the proposed sites (SK080a, SK081, SK082 and SK108) has been taken to establish whether they are suitable for foraging golden plover. However “<i>clear evidence of farming disturbance with existing sheep feeding facilities supporting the flock of sheep in these fields</i>” and “<i>elements of human and livestock disturbance</i>” in our opinion should not be taken as reasons why golden plover may not utilise the fields. Golden plover are known to forage in grazed in-bye pastures used by livestock during the breeding season as this habitat can be rich in invertebrates.</p> <p>It is also stated that with regards to sites SK080a, SK081, SK082 and SK108 that “<i>it is very unlikely that golden plovers would forage in these fields in any significant numbers, if at all</i>”. We question the relevance of the word significant here. Foraging golden plovers on land that is functionally linked to the SPA do not have to be present in high numbers for the integrity of the SPA to be potentially impacted upon.</p> <p>The lack of information and clarity on the methodology and timing of the referenced surveys and inaccurate assumptions over the potential suitability of sites to support foraging golden plover is not sufficient in our opinion to base an HRA and AA on.</p>	<p>submission versions of the Craven Local Plan) seemed to support the stated requirement for the relevant surveys in the development principles for each site, and hence the surveys would be undertaken prior to the planning applications being submitted.</p>
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