Roy Banks

From: **David Feeney**

Sent: 29 November 2018 18:28

To: Robert Bryan

Cc: Sian Watson; Ruth Parker

Subject: HRA and SEA documents: Gargrave NP

Attachments: Gargrave HRA (November 2018).pdf; Gargrave SEA (November 2018).pdf

Dear Robert,

I now enclose two updated documents relating to the HRA and SEA.

I'll also send these documents to our contact at Natural England. The good news is that we received comments from him yesterday evening on the Craven Local Plan, regarding air quality amongst other local plan topics. In relation to air quality, the additional information required by NE from Harrogate Borough Council to assess cumulative impacts for the Craven Local Plan and the Gargrave Neighbourhood Plan is the same. NE stated in their e-mail that they are currently experiencing staffing and workload problems, so whilst we can send these documents to NE, I believe their comments should suffice for the purposes of the Gargrave NP if we do not get comments forthcoming from them before the Christmas break (which is quite likely).

This is particularly because there are no figures available for HGV flows from Gargrave in any case as a result of their site allocations, because no traffic modelling is available for such a small settlement. It is stated in the HRA text that the HGV flows are expected to be extremely small. I have undertaken a tabular calculation of total traffic flows from Gargrave within the HRA document, which shows very low vehicle increases. Hence, Gargrave's traffic contribution to cumulative traffic flows in terms of the three plans is close to negligible. Section 8.4 and Appendix VIII of the document show all the information regarding air quality.

"Natural England welcomes the additional figures and analysis provided in the HGV Flows Along the A59, 65 and A6068 spreadsheet, Harrogate Traffic Flow Data Spreadsheet and HGV Traffic Flows Along The A59; Analysis of the Traffic Modelling Tables document which illustrate the conclusions reached in the Habitats Regulations Assessment. Based on the figures provided we concur with the conclusion of no adverse effects on the integrity of the Ingleborough Complex Special Area of Conservation (SAC), North Pennine Moors SAC and North Pennine Moors Special Protection Area." (Natural England, 28/11/2018)

Regarding the SEA document, Natural England previously advised that there should be a direct consideration in the text of any Likely Significant Effects in relation to the SEA Objectives. These considerations have now been specifically addressed in Chapter 5 of the document, under the eight subject areas of (a) population and human health, (b) cultural heritage, (c) biodiversity, flora and fauna, (d) water resources and flood risk avoidance, (e) climatic factors and air quality, (f) landscape and visual amenity, and (g) material assets.

I believe this information will assist you in the examination process for the Gargrave Neighbourhood Plan.

Best regards, David

David Feeney Planning Consultant ext: 46287



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