Richmondshire District Council
Local Plan Core Strategy
Proposed Submission
August 2012
Representations Form

Please read the guidance notes before completing this form

This form comprises two parts:
Part A: Personal details
Part B: Your representation(s)

Both Part A and Part B of this form need to be completed in order for your representation(s) to be valid. Please complete a separate sheet (Part B) for each representation you wish to make. Further copies of this form can be downloaded from www.richmondshire.gov.uk/localplan.aspx . You do not need to fill out Part A for each representation, provided that all representations made are securely attached.

Your completed form must be returned to the following address to reach us no later than **4pm on Friday 14 September 2012:**

Planning Policy, Richmondshire District Council, Swale House, Frenchgate, Richmond, DL10 4JE

Alternatively, you can email: localplan@richmondshire.gov.uk and submit this form as an attachment.

Please note, all representations will be made available for public inspection on our website www.richmondshire.gov.uk/localplan.aspx with personal details (i.e. email address, telephone number and signature) removed.

Part A – Personal details

	Your Details	Agent's Details
Title	Ms	
First name	Sara	
Last name	Robin	
Job title (if applicable)	Conservation officer	
Work/organisation (if applicable)	Yorkshire Wildlife Trust	
Address	1 St Georges Place	
Postcode	YO24 1GN	
Telephone No.	01904 659570	
Email address	Sara.robin@ywt.org.uk	

Part B - Your representation

Please use a separate sheet for each representation.

Name/Organisation	Yorkshire Wildlife Trust

Q1.To which part of the Core Strategy Proposed Submission Document does this representation relate? (Spatial Principle, Sub Area Strategy or Core Policy)	
Policy number (e.g. SP2, CRSS or CP8)	CP12
Page/paragraph number(s)	

<u>Please note:</u> Your representation should cover succinctly all the information, evidence and supporting information necessary to fully support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. <u>After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.</u>

Q2. Do you consider the Core Strategy Proposed Submission Document is…?						
(a) Legally compliant	Yes		No		Don't Know	x
(b) Sound	Yes		No	x	Don't Know	
If you answered 'No' to (a) or (b) above, please continue to Q3, otherwise continue to Q5.						

Q3. Do you consider the Core Strategy is unsound because it is not: (please refer to the guidance notes)	
(a) Justified	
(b) Effective	
(c) Consistent with national policy	x
(d) Positively prepared	

Please give details of why you consider the Core Strategy Proposed Submission Document is not legally compliant or is unsound. Please be as precise as possible:

The Yorkshire Wildlife Trust welcomes many aspects of Policy CP12. However the policy is not compliant with the NPPF as it does not identify and **map** biodiversity opportunity areas so that the authority can work to join up habitat through the planning process. The NPPF states in paragraph 114 that planning policies should:

"set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure;"

In paragraph 117 of the NPPF Local Authorities should:

"identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;"

Merely listing the potential biodiversity assets as in paragraph 4.12.12 does not give sufficient confidence that they will be clearly identified and protected.
Within Policy CP12 Green Infrastructure (GI) is covered but it does not include the value of GI for biodiversity and does not include within the list of green spaces important for GI the sites which are also important for biodiversity such as Local Nature Reserves, Sites of Importance for Nature Conservation etc.
A document produced by the RTPI and the Wildlife Trusts nationally provides an excellent overview of the importance of the multi-functionality of GI and how this can be incorporated into the planning system. The document, "*planning for a healthy environment – good practice guidance for green infrastructure and biodiversity*" can be downloaded from our website at http://www.ywt.org.uk/what-we-do/planning

(Continue on a separate sheet if necessary)

Q4. Please set out what change(s) you consider necessary to make the Core Strategy Proposed Submission Document legally compliant or sound, having regard to the test you have identified at Q3 where this relates to soundness. You need to say why this change will make the Core Strategy 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:

It will be necessary for the Core Strategy to have either a background paper which identifies and maps out the biodiversity assets and opportunities where sites can be linked up and enhanced within the area, or a map within the core strategy which provides this information. Green Infrastructure can include biodiversity assets and opportunities.

Continue on a separate sheet if necessary)

Q5. If you wish to support the legal compliance or soundness of the Core Strategy Proposed Submission Document, please use the space below to set out your comments:

(Continue on a separate sheet if necessary)

If your representation is seeking a change to the Core Strategy Proposed Submission Document, do you consider it necessary to participate at the oral part of the examination?	
No, I do not wish to participate at the oral examination	x
Yes, I wish to participate at the oral examination	

If you have selected 'No', your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

If you wish to be notified of future stages of plan preparation, please tick the appropriate box(es) below.			
Submission for Examination		**Notify me by:** (please tick)	
Inspector's Report Publication		Post	
Adoption		Email	**x**

Please Note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:	
Date:	