

The HRA (CD –A6) does not properly and correctly stress test the plan impact on European Protected Sites. At paragraph 2.2 the HRA refers to the “quantum and location of proposed growth” and “the nature, size and location of growth that can trigger particular impact pathways”. However, mirroring the approach taken by the local plan there is no cumulative understanding of the nature or quantum of proposals. The HRA does not attempt to understand what a “Sports Park” is and it does not cumulatively consider or understand the impacts of the related sites IP150a through to IP150e. At Paragraph 2.3 of the HRA, it is suggested that Map 4 shows the relationship between the allocated sites and the European Protected sites ... but it simply does not do this. Indeed, no map in the document identifies the relationship. Paragraph 2.3 of the HRA goes on to say “Looking at sites on a map enables a consideration of site allocations and their geographical relationship to European sites in terms of distance and relevant features”. The HRA, from the start, does not understand the proposed developments or their relationship with the SPA.

Thereafter Table 3 of the HRA misunderstands the impact pathways between the Orwell Estuary SPA, SSSI, RAMSAR site, Bridge Wood Local Wildlife Site and the accumulation of development proposals at Ravenswood. To illustrate this point, SP7 (including the IP150b Sports Park) is shown in Table 3 as having “no Likely Significant Effects” but the document fails to accumulate the development in the location. At table 4, the Ravenswood allocations are all listed separately rather than as one masterplanned site and at Table 5 the responses say that the Sports Park is “Use type unlikely to generate potential risks” without looking at lighting, traffic, visitor generation, noise etc.

The Council’s response to the HRA A6 provided at A6 1 is to make various insertions to Appendix 3b (site sheets) which is just a list of constraints for individual sites (not cumulative) and according to Document I -2 page 234 (and multiple other references) are just “Guidance” or “for information”. Thus the Local Plan Site Allocations Policies do not have a mandatory HRA or Appropriate Assessment built into them because Appendix 3b is not Local Plan Policy.