

## COMMENTS REGARDING “FURTHER STATEMENT ON SC8 – PAPER PSF066”

1. The above paper tracks the developments that took place over the period of the public hearing culminating in a re-drafted policy SC8. The comments below focus on the re-drafted policy.
2. As it stands, my overall concern is that the policy and the policy intention will be very clear to those who were privy to the tripartite discussions, but it will not offer much meaningful insight to others. Indeed, it is not immediately apparent what, in brief, has changed to warrant a complete re-drafting of the policy. The re-draft itself is not an easy read. Different interpretations can be made. Also, the overall tenor of the policy seems to concentrate not so much on the need to preserve protected bird habitats, but on the measures to allow new development proposals to proceed unfettered.
3. As such, I feel the policy statement now presented should be revised so that it is capable of being picked up and understood by laypersons, this then allowing non-technicians to make an early assessment of whether or not there is a potential issue with any site - and, if there is, how this can be taken forward and by whom, and also what supporting evidence is required and where it can be accessed or commissioned.
4. Examples from the re-drafted policy that lead me to suggest the need for a review of the draft are
  - Should Zone B read “land between 400-2,500 metres” (changed to “up to 2.5 km” in the re-write)?
  - Should Zone C read “land between 2,500-7,000 metres (changed to “up to 7km” in the re-write)?
  - What about sites that span two zones – should the zone category be the one that contains the predominant part of the site in question?
  - Could a short summary of the “derogation tests of Article 6(4) of the Habitats Directive” be set out to give some initial sense of the issue rather than having to access another document?
  - In the same paragraph, the draft seems to imply that in all zones any habitat issue is capable of mitigation to allow a development to proceed – are there no show-stoppers therefore? If there are, what are they? Some examples of the acceptable mitigations would be helpful
  - In the Zone A paragraph, what sort of conditions would need to prevail for it to be established “exceptionally” that the development would not have an adverse effect upon the integrity of the site?
  - In the Zone B paragraph what exactly does “based on such evidence as may be reasonably required” mean and who instigates the supply of such evidence?
  - In the Zone C paragraph, presumably the listed recreational pressure mitigations apply to all zones over and above any other required mitigations? Is that the case? (And, of course, increased recreational pressures on iconic sites such Ilkley Moor and the

Cow and Calf rocks are not created solely by those new homes within a 7km boundary).

- It would be helpful if the policy for each zone was preceded by a one-line statement that illustrates how it is distinguished from the other zones
5. The above points are made simply to illustrate my belief that the re-drafted policy needs to be much sharper so that it can be readily and correctly interpreted by all interested parties. Naturally, if the policy statement is revised as such, the suggested examples and amplifications could be consigned to the supporting paragraphs, ie as currently set out in paragraphs 3.104 to 3.123 of the Publication Draft. Clearly, these too will need a complete overhaul to ensure they harmonise with the new version of the policy.
  6. Hopefully, these comments will be helpful in the process of converting the policy and its supporting text into a main modification.

Ben Rhydding Green Belt Protection Group