

Issues with Summary of Local Plan Representations -Landlink Estates

Representation ID	Policy	Issues identified with summary	Requested change to representation	Confirmation / Commentary by CDC that change is supported
5352	Response to Climate Change Missing policy on Net Zero	<p>1. Please ensure written representations are attached to this representation.</p> <p>The other attachments regarding the ALI2 site at Selsey are not relevant to this policy</p> <p>2. The summary does not include the basis for why LLE believe the plan is not legally compliant – see request in next column.</p> <p>3. There is a mistake in the change to plan commentary. The X% - has been shown as X20% - this was a footnote 20 which states that percentage reduction in carbon emissions to 2039 needs to be calculated by the council from the 1990 baseline. CDCs current climate change action plan target stop at 2025</p>	<p>Remove all Site ALI2 technical attachments but include the overarching written representations.</p> <p>Please include the following statement in summary response to this part of the plan: “The position of the Council is not compliant with National Policy. Section 19(1A) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to include in their local plans policies designed to secure that the development and use of land in the local planning authorities area contribute to the mitigation of common adaptation to, climate change.</p> <p>The plan has failed to demonstrate a vision of how to achieve net zero by 2050, and decarbonising of power systems by 2035 in line with the Climate Change act 2008 and ongoing ambitions towards Net Zero.</p> <p>The 2008 Climate Change Act as amended sets a legally binding target to reduce net greenhouse gas emissions from their 1990 level by 100% by 2050. The plan does not demonstrate how this is achieved and is NOT LEGALLY COMPLIANT and should be withdrawn”.</p> <p>Please add the footnote details as set out in 3.in the left hand column adjacent.</p>	

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5353	Policy S1	<p>Summary is incomplete please see suggested addition.</p> <p>Change to plan is incomplete please add the suggested text</p>	<p>Add the following to the summary at the end.</p> <p>“as it is not been justified, neither is it supported by evidence because:</p> <ol style="list-style-type: none"> 1. Does not respect the settlement hierarchy 2. SFRA confirms the site passes the sequential test and is free from flooding for 100 years 3. Does not mitigate impacts on B2145 <p>Add the following to requested change to the plan:</p> <p>“The suggested changes to the policy includes achieving net zero by positive strategy for development of energy from renewable sources and carbon sequestration, climate change and adaptation for coastal change management and adding detail about resilience on the Manhood Peninsula including tidal flooding”</p>	

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5354	Policy NE1 – Standalone Renewable Energy	<p>Summary is incomplete please add suggested text</p> <p>Change to the plan is incomplete please add the suggested text:</p>	<p>Add the following wording on summary after the word ‘law’:“the policy is not sound because it does not comply with national policy set out in NPPFI 55a) and b)</p> <p>There is no evidence in the totality of the published evidence base to consider renewable energy production and how this intersects with other land use policies in the plan. The plan does not identify the quantum of additional renewable energy development required in the plan period and how this intersects with Gaps Policy NE3 and Strategic Wildlife Corridors Policy NE4.</p> <p>Add the following wording on change to plan “including a requirement to identify the increase renewable energy to meet Net Zero by the end of the plan period and support for Battery Energy Storage Systems and Green Hydrogen”</p>	
5355	Policy NE2 Natural Landscapes	Revise the wording in summary so it is more accurate and add detail of changes required to the plan.	<p>Add the following wording on summary: <u>The extent of what is considered</u> a significant loss of BMV Land is not quantified</p> <p>Add the following wording on change to plan ‘ to include considerations of climate change, mitigation and adaptation to achieve net zero</p>	

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5357	Policy NE4 -Strategic Wildlife Corridors	The wording in the summary column is incorrect. Please change as indicated:	<p>Add the following wording on summary</p> <p>Objection on grounds that wildlife corridors have not been assessed for their impact on delivering net zero; wildlife corridors may contain important sites for delivery of renewable energy; wildlife corridor renders proposal by Landlink for solar farm unacceptable, requiring unjustified sequential testing not supported in national policy as it is contrary to NPPF 158a) where renewable energy applicants do not need to demonstrate the overall need for the development; SA not considered impact of removing BMV land within the proposed wildlife corridors which exceeds NE threshold; policy not assessed in terms of reasonable alternatives in sustainability appraisal.</p>	

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5357	Policy NE14 Manhood Peninsula	Revise the wording in summary so it is more accurate and add detail of changes required to the plan	<p>Add the following wording on summary “The policy is not sound based on proportionate evidence it does not reflect the future for the Manhood Peninsula based on land use solutions to mitigate and adapt climate change. Need to identify sites for relocation of vulnerable communities.”</p> <p>Add the following wording on change to plan “NE14 revisions to include climate change adaptation and mitigation including designating an area of coastal change management and supporting development that is capable of long term defence by recognising managed retreat.”</p>	
5362	Sustainability Appraisal	<p>The response on the sustainability proposal is an objection. ensure written representations are attached. The other detailed technical attachments regarding the AL12 site at Selsey are not relevant to the response on the SA</p>	<p>Please record the response to the SA as an <u>objection</u> Include the following missing text from the summary: “the Sustainability Appraisal plays an important part in demonstrating that the local plan reflects sustainability objectives and has considered reasonable alternatives. There needs to be an examination of reasonable alternatives so that the plan reflects the sustainability objectives. No recognition of the significant role of renewable energy in mitigation of fossil fuels and GHG increasing climate change, and this is not addressed at all under climate change mitigation section of the SA.</p>	

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Missing Representations	Objective 1 Climate Change	Missing from summary	Add the following wording to the summary The objective does not include any mention of the requirement for renewable energy development.	
Missing Representations	Objective 7 Strategic Infrastructure	Missing from summary	Add the following wording to the summary The objective does not include any mention of the requirement for renewable energy development. There is no plan for renewable energy in the district, this demonstrates therefore the plan fails its legal duty to contribute to the mitigation and adaptation to climate change.	