

**VALP LOCAL PLAN 2013-2033 EXAMINATION**  
**Discussion Document D2**  
**Policies NE1 and NE2**

VALP contains two policies concerned with the protection of fauna, flora, geological and physiographical features. One (NE1) is concerned only with protected sites. SSSIs and ancient woodlands are specifically mentioned in the policy itself but supporting text refers also to local geological sites of regional significance and local nature reserves. The other policy (NE2) is concerned with biodiversity and geodiversity in general but it contains specific sections applying only to internationally designated Special Areas of Conservation (not specifically referenced in policy NE1) and to SSSIs. In its response to my question 95 the Council stated that it would have no concern if I felt that criteria (c) or (d) of policy NE2 were better put into NE1.

There is clearly duplication and overlap which is unclear and therefore unlikely to be effective and so, not sound. In preparing the Modifications which it thinks are necessary following the Hearing sessions, I would be grateful if the Council would consider merging the two policies and their supporting text into a single policy, eliminating the distinction between greenfield and brownfield sites in criteria (a) and (i) of NE2 which, at the hearing sessions the Council accepted was an unnecessary distinction and including the acceptance of mitigation within criterion (g) of NE2, a point which the Council also accepted during the Hearing session.

I would be grateful if the Council would give consideration to this suggestion in formulating the Modifications needed to make the plan sound.

**AVDC Response:**

AVDC will be proposing modifications to Policies NE1 and NE2 and their supporting text to merge these policies into a single policy with supporting text. We trust this will address the Inspector's concerns.