

Stakeholder Reference:  
Document Reference:

Part A

Making representation as Resident or Member of the General Public

Personal Details		Agent's Details (if applicable)	
Title	Mr		
First Name	John		
Last Name	Fitzmaurice		
Job Title (where relevant)			
Organisation (where relevant)			
Address			
Post Code			
Telephone Number			
E-mail Address			

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## Part B

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### REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 38

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: No

Sound: No

If no, then which of the soundness test(s) does it fail? Consistent with national policy

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

I object to MM38 on the grounds that damage to the SAC will still occur, and that the so-called interim Air Quality Mitigation Strategy is woolly, will not prevent further detriment, and it does not meet the strict criteria laid down by the Holohan court judgement.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan 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.**

No damage to SAC, Adair quality mitigation strategy is definitive and therefore can be commented upon, and meets strict criteria laid down by the Holohan court judgement.

Signature: John Fitzmaurice Date:  
13/08/2021