



Sussex
Wildlife Trust

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Hastings Local Plan – Consultation Draft (Regulation 18)
Winter 2020/21

Thank you for consulting the Sussex Wildlife Trust (SWT) on the draft Hastings Local Plan. SWT recognises the importance of a plan led system as opposed to a developer led process and supports Hastings Borough Council's (HBC) desire to produce a cohesive Local Plan. Therefore we hope that our comments to this regulation 18 consultation are used constructively to make certain that the plan properly plans for the natural capital needed within the Borough and ensures that any development is truly sustainable.

Evidence Base

SWT is concerned that this consultation is being carried out before many of the evidence base documents have been produced. In particular, we are concerned that the Local Wildlife Site (LWS) is not available given that a number of site allocations proposed in the plan that either encroach onto, or are directly adjacent to LWS. We do not believe that the potential impact of these allocations, nor the suitability of the policy requirements related to the LWSs can be assessed without further information.

Additionally, there appears to be no evidence presented related to the Borough's green infrastructure (GI) or wider natural assets. There are a number of policies that require enhancements to GI, but there is no baseline provided or strategic aspirations for what the GI network could deliver. Similarly, there is very little information provided on the natural assets within the Borough or how these could contribute to the Nature Recovery Network, likely to be required via the Environment Bill in the plan's lifetime.

The NPPF is clear in paragraph 171 that plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure and plan for the enhancement of natural capital at a landscape scale. Further to this, paragraph 174 states that plans should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks. Looking at the documents available in the evidence base, it does not appear that this has happened.

Additionally, there appear to be elements of the plan, particularly covered in 'other policies' that are not written. SWT is very concerned that HBC plan to go straight to a regulation 19 consultation without any initial consultation on these missing elements. The consultation process is much more restrictive at regulation 19 with far less scope to make changes to the plan. SWT believe HBC should do another regulation 18 consultation once the evidence base is more complete and all the policies for the plan have been drafted.

Development Objectives for Hastings by 2039

SWT is pleased to see 'addressing climate change' as the first development objective, this is vital given the climate emergency we find ourselves in and the requirements of NPPF paragraph 149. We also support the reference to expanded green infrastructure as contributing to the net zero ambition. We would like the

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connection between the ecological emergency and the climate emergency acknowledged in the plan and advocate for HBC prioritising natural solutions to climate change that also restore biodiversity

We note that the objectives includes 'celebrating our unique natural landscapes'. SWT is unclear what celebrating means in this context and advocate for a more explicit objective that is more in line with NPPF paragraph 170 as follows:

*'The starting point for achieving this is **protecting and enhancing** our unique natural landscapes and the historic built environment that make Hastings special.*

Section 3 - Development Strategy

SWT strongly supports the focus on climate change in the draft plan and particularly the acknowledgement in paragraph 3.4 that the natural environment has an important role in carbon mitigation. We do think that HBC need to also acknowledge that we are experiencing a twin emergency of massive nature decline which the plan should also help to address.

Whilst the opportunities provided by the local plan process in helping develop a Nature Recovery Network (NRN) is acknowledged and supported in the Sustainability Appraisal (Table 5.9) there is no reference to the NRN in the actual plan. SWT is concerned that there has been no real consideration of the impact that the site allocations in particular will have on the Borough's ecological network and therefore the plan is not in line with NPPF paragraphs 170, 171 or 174.

Paragraph 3.5 states that 'Significant levels of new development are not expected within these locations or in areas strictly protected for their natural environmental benefits'. However, there are a number of sites allocated in the draft plan that encroach into LWS – please see our comments under Appendix 1 - Site Allocations.

We are also particularly concerned about the reference in paragraph 3.10 to the use of Local Development Orders in the Queensway Corridor. SWT objects to components of this allocation due to the number of LWS within the red line boundaries. Given the significant environmental value of many of the sites within the corridor, SWT does not believe development through Local Development Orders is appropriate, especially when the environment evidence base against which decisions will be made is lacking.

Overarching Strategic Policy 1 (OSP1): Tackling Climate Change

SWT strongly supports this policy and is encouraged by its position as an overarching policy that influences the other policies that follows. We are particularly supportive point D – expanding the network of green infrastructure. However, as stated previously, it does not appear that HBC have an up to date Green Infrastructure Strategy or any evidence relating to the Borough's ecological network/NRN. The NPPF requires local planning authorities to take a strategic approach to GI (paragraph 171), but it is not clear if this has been done or will be done when it comes to decision making.

We are also disappointed that there is no reference to the ecological emergency or how actions to address climate change can also benefit biodiversity, especially through the use of natural solutions. Additionally, that GI can be multi-beneficial and can particularly contribute to the protection and enhancement of the Borough's ecological networks. The NPPF is clear in paragraph 170 that planning policies should establish coherent ecological networks that are more resilient to current and future pressure. We therefore recommend that point 1D is amended as follows:

*'Expand the network of green infrastructure recognising its essential role in carbon storage **and biodiversity** as well as its health and wellbeing benefits.'*

And that point 2 is amended as follows:

*'The Council will support measures that help mitigate and adapt to impacts of climate change at the level of individual sites, recognising the cumulative impact of development **and the multifunctional benefits of nature-based solutions**'*

SWT is supportive of the concept of a Carbon Mitigation Zone in point 1E, however we feel that much more detail must be provided about what this means on the ground. The area identified in the plan is to the north of Marline Valley Nature Reserve (designated as a SSSI, LWS and LNR), which the Sussex Wildlife Trust manages. The draft plan does not include a great deal of information on the Carbon Mitigation Zone and therefore SWT is unable to make informed comments about the suitability of this policy at this location, or the potential impacts and opportunities that developing the mitigation zone might present. Any proposals put forward must protect and enhance the SSSI in line with the NPPF.

SWT understands that further information and evidence about options will be gathered before the regulation 19 consultation. Again, it concerns SWT that there will be no formal opportunity to comment on these plans before the submission plan is published for regulation 19. We would like to discuss the options for the site with HBC before regulation 19 and in particular explore how the site might contribute to the Borough's NRN and provide natural solutions to climate change.

We are concerned about the reference to wind energy in this policy given the impacts that onshore wind turbines can have on wildlife, particularly birds and bats. Any potential sites for wind energy should be considered against the Borough's NRN and assessed for potential impacts to connectivity or high mortality risk to birds and bats.

Strategic Policy 1 (SP1): Directing Growth

SWT supports point 6 of this policy, but want to be clear that areas designated for their natural environmental quality includes sites designated for their biodiversity value, particularly SSSI, LWS and LNR.

Strategic Policy 5 (SP5): Conserving and Enhancing the Natural Environment

SWT strongly supports the inclusion of this policy however part 3 is not sufficient. The NPPF is clear that plans should protect and enhance biodiversity (paragraphs 170, 171 and 174). It is not acceptable that point 3 only refers to protecting sites or habitats and it should be amended to:

*'The Council will protect **and enhance** sites or habitats designated or identified of international, national, regional or local importance for biodiversity or geological importance, including ancient woodland*

As mentioned above, we are also concerned about the deliverability of this policy given the lack of evidence on the current GI network or where expansion should occur. SWT strongly encourages HBC to pull together a more up to date evidence base which will help it ensure that GI is delivered strategically with measurable gains.

Strategic Policy 7 (SP7): Managing Coastal Erosion and Flood Risk

SWT supports the inclusion of this policy, however we feel there should be more explicit support of nature based solutions to flooding that can provide multifunctional benefits. This is particularly relevant for Hollington Stream which should act as a green and blue corridor running through the Borough and we encourage HBC to work to restore and enhance the natural functioning of this asset. Looking at the various flood maps appended to the SFRA, the issues with the Hollington Stream seem to stretch south to other sites covered in Focus Area Policy 4. It is concerning that these sites seem very vulnerable to flooding and yet are still allocated in the plan.

We are also concerned about coastal squeeze and the impacts this could have on biodiversity, particularly areas of vegetated shingle and the Beachy Head East Marine Conservation Zone. . New development that could result in coastal squeeze should need to demonstrate how it is addressing this issue. We therefore recommend the following policy amendments:

1. *'The Council will support the development and improvement of flood defence infrastructure and drainage assets in Hastings. Proposals for sea defences will be supported, subject to the submission of a coastal erosion vulnerability assessment, that demonstrates the sea defence will not be to the detriment of adjacent or downshore sections of coastline and ecological evidence to demonstrate that coastal and intertidal habitats will be protected and enhanced.'*
4. *Measures that help reduce flooding across the Borough will be supported, particularly where they embrace natural flood management to deliver multi-functional benefits for people and wildlife, and specific measures to address surface water flooding particularly encouraged in areas identified as being at particular risk comprising:*

Strategic Policy 8 (SP8): Transport Infrastructure

SWT supports the inclusion of this policy however we are concerned about part 6A. The Queensway Gateway Road has resulted in the destruction and fragmentation of the Hollington Valley LWS, a fundamental green corridor that should lead from the countryside into the centre of the town. Whilst we accept that now that the majority of the road has been built, it should be connected at the eastern end. SWT strongly objects to the inclusion of '*other future sites enabling road infrastructure to unlock potential development sites*'.

Paragraph 16 of the NPPF states that policies should be clearly written and unambiguous, we do not think this is the case. The policy is too vague and opens up other vulnerable areas of the Borough to damaging road building schemes. There is no evidence provided to justify why other future sites may be needed or where these might be. SWT asks that '*other future sites enabling road infrastructure to unlock potential development sites*' is deleted from this policy.

Strategic Policy 9 (SP9): Renewable Energy and Low Carbon Heating

SWT supports HBC in taking action to become carbon neutral we are concerned about the potential location of wind turbines adjacent to land designated for its biodiversity value. Table 5.11 of the Sustainability Appraisal sets out that under all options the construction of wind turbines has the potential to result in habitat and species disturbance and loss and that there is a risk of disturbance to sensitive species and bird and bat collision.

Both Queensway and Land at Breadsell are adjacent to Marline Valley SSSI which is ancient woodland and has records for various bat species. Whilst Land south of Wilting Farm appears to be within the Combe Haven Countryside Park and close to the Combe Haven SSSI, which are important sites for birds and also have bat records. SWT is very concerned about the suitability of these sites for wind turbines and particularly whether avoiding impacts on ecology is possible. Again, HBC should be providing more evidence on these options and the likely impacts before committing to them in policy.

Section 4 – Development Focus Areas

All of the focus areas contain Local Wildlife Sites that may be impacted on by development. SWT would like to see a consistent approach across the four Focus Area Policies, so that they all list the LWS within them and require that the development of these areas ensures the protection and enhancement of the various LWS at key components of the Borough's ecological network.

Section 5 – Development Policies

Development Policy 3 (DP3): Sustainable Design

SWT is concerned that there is only a requirement to conserve biodiversity in part 5. As stated previously the NPPF is clear that the planning system should be enhancing not just protecting. Therefore this section of the policy should be amended as follows:

*'...the Council will take a balanced approach to ensure that we both maximise the available opportunities for reducing our carbon emissions and promoting renewable energy generation whilst still conserving **and enhancing** special landscape character, biodiversity and the significance of heritage assets'.*

Also, we do encourage HBC to be more explicit throughout the plan in promoting nature-based solutions to climate change where possible as this is likely to deliver the most public benefit whilst addressing both the climate and ecological emergencies.

Development Policy 5 (DP5): Biodiversity

SWT strongly supports the inclusion of this policy and particularly point 2 which recognises the need for appropriate ecological information and the requirement within the mitigation hierarchy, NPPG and the NPPF to always avoid impacts in the first instance.

SWT is concerned that in point 3 there is a requirement to make a financial contribution towards biodiversity offset rather than a more general requirement for compensation which the developer may choose to deliver. Additionally, the compensation should provide for an equivalent or greater value of biodiversity. We are concerned that this policy appears to suggest a financial contributions as a requirement as there would be no guarantee that the financial contribution would result in like-for-like habitat compensation for a particular development.

We are pleased however to see the requirement for Biodiversity Net Gain (BNG) included within the policy. We encourage HBC to be more ambitious in its aims and require a 20% gain as justified in table 5.9 of the Sustainability Appraisal. It is clear that the Borough's habitats are particularly fragmented and that habitats have been lost in recent years to development. If HBC want to address this, we believe 20% is a more appropriate figure. SWT suggest that point 4B should be amended:

*'A minimum of 10% biodiversity net gain on all greenfield sites using the DEFRA metric (or equivalent agreed as part of any pre-application discussion) **delivered on site. Where it is achievable, a 20%+ net gain is encouraged. Major developments should demonstrate this at application stage prior to determination. Where it is necessary to deliver net gain off site, delivery should be focused on locations that can deliver as part of a strategic network for biodiversity.***

SWT is concerned that the wording in point 5 confuses compensation with offsite BNG. HBC must be clear that the requirement for BNG is in addition to any compensation required as part of the mitigation hierarchy. Additionally, we are concerned that HBC is too focussed on existing designated sites as receptors for BNG money/delivery. BNG should be used where it is most effective with the highest opportunities for gain. This may be existing core areas or restoration and buffer areas. This is another reason why HBC need to ensure they are confident about their NRN and the strategic opportunities to deliver nature's recovery. We therefore recommend that point 5 is amended as follows.

*'Where biodiversity net gain cannot be achieved on site **or offsite by the developer**, the Council may accept a payment secured through a legal agreement to deliver suitable off-site **biodiversity net gain** through biodiversity enhancements **on land that delivers strategically towards a nature recovery network.***

Development Policy 6 (DP6): Green Infrastructure

SWT strongly supports the inclusion this policy. However, because there is no supporting text for the development policies, it is not clear what HBCs aspirations for GI are. We do not believe the evidence base currently includes a GI Strategy. This hinders opportunities to identify impacts of proposed allocations or opportunities for strategic delivery and strongly encourage HBC to address this in its evidence base.

SWT is pleased to see a clear distinction between the biodiversity and GI policy. We are also encouraged to see that point 2 is suggest that not just major development should be delivering GI. The council should encourage and facilitate smaller developments and householder applications to understand the role and impact they can have by considering the integration of GI at an early stage. This could be support through an advice note or as part of an SPD.

Point 3 of the policy references the Site Allocations Schedule (Appendix 1). SWT is concerned that this part of the plan is being used as the reference of where high quality GI can be delivered. We make this statement because we are unclear how the policy wording within the allocations have been arrived at, for example have they been informed by ecological evidence provided by the council or landowner? In particular, some of the allocations seem to say: *Introduce policy compliant 'greening' to the site in a form appropriate to the urban setting*

SWT is unclear what this means and what it intends to deliver. Is this demonstrating the need for high quality GI on site or is this the application of an urban greening factor as mentioned in point 6?

Other allocations seem to suggest retention of woodland for example TC7 white rock garden. However, we do not believe this can be related specifically to GI aspirations and is more an example of avoiding existing habitat loss. We suggest that policies are clearer about the sites that must deliver GI both at a site and wider network scale.

We support the aim in point 5 to deliver GI onsite for development. SWT question the statements relating to financial contributions for off-site locations for new trees or management of existing trees. If trees are removed/lost we would encourage HBC to ensure there is clear replacement of the tree(s) which is equal to or more than the existing biodiversity value of the tree. It is imperative that new planting happens in a suitable location and does not compromise other important biodiversity features. This again highlights the importance of a current and informed evidence base to identify future locations for strategic offsite delivery of Biodiversity Net Gain and GI requirements.

Other Planning Policies

We note that Management of biodiversity net gain and urban greening will be set out in other guidance. SWT would like to be consulted on the production of this guidance before it is included in the regulation 19 plan.

Appendix 1: Site Allocation Schedule

Overall there are inconsistencies in the ways designated sites and other biodiversity assets are treated in these policies. The NPPF is clear that sites of biodiversity value should be protected and enhanced (paragraph 170) and that plans should identify, map and safeguard those sites, along with the other components of wider ecological networks (paragraph 174). However a number of allocations encroach on designated sites.

There are also a number of greenfield sites allocated with little or no evidence of their current biodiversity value or how they contribute to the Borough's ecological network and natural capital. For example, HL115 appears to be a buffer area to the LWS and could be an important recovery area. Similarly site HL40 appears to link Broomgrove Local Wildlife Site in the west to Speckled Wood and the Ore Stream in the east. These kind of linkages should be explored before allocation via the evidence base, such as the LWS review and a GI strategy. SWT strongly advises HBC to update its ecological evidence base and then consider these allocations against this.

The Sustainability Appraisal Technical Annex lists all the potential development sites identified in the SHELAA and assesses them under a RAG rating. Paragraph 2.4 *'Based on these criteria, a 'red/amber/green' rating was then applied to each site for each criterion to provide an indication of site constraints and opportunities and the relative sustainability merits of the sites.'* However, there is no further information as to how this RAG assessment was considered in order to determine if a site should be allocated in the local plan. There is no information on how the different criteria might be weighted in decisions, with sites that have over 50% of criteria scored as red and amber still in the plan e.g. EL1 Queensway North and HL1 Holmhurst St Mary.

There is no explanation either in the main interim Sustainability Appraisal or the Technical Annex as to how the RAG scores have led to the selection of allocations presented in the local plan. There is no discussion of the merits of each site or how the individual RAG results have been interpreted or weighted. Indeed there is

virtually no discussion of site allocation options in any of the evidence base documents. This is clearly not sufficient.

It is also disappointing that the criteria for Step 2 – evaluation of opportunities do not include any consideration of how a site may contribute to the Borough's GI network/NRN/BNG or climate change. There appears to be no real consideration of how the local plan can actively deliver enhancements to biodiversity as required by the NPPF paragraphs 170, 171 and 174.

Finally, section 4.19 of the SHELAA states that '*The town's biodiversity and geological resources will be protected and enhanced. Sites wholly within these designations were screened out at Part 1 and not given any further consideration*'. This includes sites within LWS however, some sites have been allocated in the plan that are entirely within a LWS. It appears that these sites may have been included because they have extant planning permission, but this is not clear from the draft Local Plan. It would be helpful if HBC could be explicit about which site allocations have extant planning permission.

Even if a site that encroaches onto a LWS has planning permission, SWT does not advocate it being included as an allocation. Given the economic climate and uncertainties following the global pandemic, we cannot be certain that sites with permission will proceed to delivery. These sites should still be considered against the current screening considerations, which we presume have been updated since the planning permission was granted to reflect the poor state of the Borough's natural capital.

The lack of an environmental evidence base when it comes to site allocations is concerning, especially given that there will not be another opportunity to comment on these allocations before the submission plan. The NPPF is clear about the need to take an active role in identifying components of the natural environment to ensure that Local Plans protect and enhance biodiversity, SWT strongly advises HBC to update its ecological evidence base, consider these allocations against this and consult again.

SWT has highlighted the sites of most concern below, but due to the number of allocations, we may have inadvertently missed some. Additionally, there are a number of 'Small sites less than 20 units' which we believe also encroach on LWS, but we have not had the opportunity to go through these thoroughly. Any allocation on or adjacent to a biodiversity asset should include wording that requires adverse impacts to be **avoided** and for the asset to be **protected and enhanced** as required by the NPPF and NPPG. Sites that are entirely or majorly within LWS should not be allocated.

Site reference: HL1 Site name: Holmhurst St Mary

SWT objects to this allocation and as it incorporates the entirety of the Holmhurst St Mary Local Wildlife Site. It is not acceptable to simply include a policy requirement of '*minimise the impact on the Holmhurst St Mary Local Wildlife Site and ancient woodland within the site and incorporate appropriate conservation and mitigation measures*' as it is not clear how this can be done when the LWS covers at least 50% of the site. The policy needs to be much more explicit in avoiding any impacts on the LWS and confining development to outside of the designation.

This is not compliant with policy SP5 which states that sites designated for their biodiversity importance will be protected. We understand that the site has current planning permission that involves developing a significant proportion of the LWS. This is very disappointing and gives SWT concern about HBC's ability to protect or enhance LWS through the development management process.

Site reference: HL21 Site name: Horntyte

SWT does not object to this allocation, however it is not clear why the requirement is only to '*minimise impacts on Summerfield Wood Local Nature Reserve*'. There is a clear policy requirement to avoid impacts on locally designated sites both in the NPPF (paragraphs 171 and 174) and within the plan in policy SP5. Additionally, other site allocation policies do require avoidance such as site HL19. This should be a condition of development for all sites that site adjacent to biodiversity assets. This language is also not consistent with the requirements for nearby site HL55 which requires that the LNR is protected. It should also be explicitly

stated that the site is also a Local Wildlife Site as it is in the policy for HL19. We recommend the following wording, this is in line with the NPPF:

Avoid adverse impacts on Summerfield Wood Local Nature Reserve and Local Wildlife Site and incorporate conservation and mitigation measures to enhance the site.

Site reference: HL55 Site name: Summerfields

There should be a requirement to protect and enhance Summerfields Wood LNR and recognition of its designation as a Local Wildlife Site. Without this, we do not believe the allocation is compliant with the NPPF.

Site reference: HL7 Site name: Former St Leonards Academy (Grove School), Darwell Campus, Darwell Close

Again SWT believes the wording needs to be more explicit to ensure that adverse impacts on the various adjacent biodiversity assets are avoided in line with the NPPF, draft policy SP5 and other site allocation policies. Additionally the council should be looking for enhancements to these sites in line with DP5 and similar site policies such as HL84 which requires the LWS to be protected and enhanced. We recommend the following wording:

Avoid adverse impact on the adjacent Wishing Tree, Filsham Golf Course Local Wildlife Sites and ancient woodland and incorporate appropriate conservation and mitigation measures to enhance these features.

Site reference: HL9 Site name: Seaside Road, West St Leonards

SWT is very concerned about this allocation given it sits in flood zone 3 and is in very close proximity to the Beachy Head East Marine Conservation Zone and the Dungeness, Romney Marsh and Rye Bay SPA. No evidence appears to have been provided to demonstrate that it is possible to 'address flood risk' on this site and we are concerned about impacts any engineered solutions could have on the adjacent protected sites. It is also very concerning that the proximity of these sites are not even mentioned in the policy.

The NPPF is clear that the plan should be deliverable and it is not clear that this is the case. HBC need to look at the flood risk for Focus Area 4 holistically and aim for strategic, and preferably nature based solutions.

Site reference: HL84 Site name: Pilot Field, Elphinstone Road

We support the requirement in this policy to protect and enhance the LWS however, the requirement should be to avoid adverse impacts in line with draft policy SP5 and the NPPF. We recommend the following wording:

Protect and enhance the Ochiltree Woods Local Wildlife Site situated within this site to the north and east, avoiding any adverse impacts.

Site reference: HL12 Site name: Former Malmesbury House, West Hill Road

SWT objects to this allocation given it sits entirely within the Caves Road Cliffs Local Wildlife Site. No evidence is provided to demonstrate that 117 dwellings can be delivered when also avoiding impacts on the LWS as required by SP5. It is clear that the local plan ecological evidence base is not sufficient to justify this allocation and we question its deliverability.

Site reference: HL11 Site name: Cinque Ports Way (former Stamco timber yard and TA centre)

As with site HL9, SWT is concerned that there is no reference to the proximity of this allocation to Beachy Head East Marine Conservation Zone and the Dungeness, Romney Marsh and Rye Bay SPA. We are also concerned about any 'flood protection and mitigation' causing adverse impacts upstream via the Coombe Haven. The potential hydrological connections and impacts need to be understood and we advocate HBC

taking more of a strategic approach to flooding within Focus Area 4. The current situation with the Bulverhythe application does not inspire confidence.

Site reference: SIEA1 Site name: Queensway Corridor

SWT is very concerned that the impact the Queensway Corridor has already has on biodiversity, particularly the Hollington Valley LWS and Marline Valley SSSI. We strongly recommend that this policy includes reference to all the designated sites and biodiversity assets within and adjacent to the redline boundary and explicit requirement to avoid impacts and deliver enhancements. We are also concerned that there seems to be no consideration of the cumulative impacts developing all these sites on the Borough's ecological network.

We do not believe that the allocation of all these sites is justified or compliant with the NPPF requirements around biodiversity. In particular, EL25 and EL26 will destroy the top of Hollington Valley LWS and should be omitted from the plan. One of the LWSs most valuable features is the connectivity from Beauport Park LWS in the wider countryside, down into the town. The whole Hollington Valley corridor should be a focus for biodiversity recovery as waterways are key components of Nature Recovery Networks, however there is no mention of the LWS within the policy. Other LWS such as Wainwright Close and Church Wood also look to be impacted by this development and yet this is not mentioned.

If HBC want to look at the Queensway Corridor as a strategic allocation, then it should be considering the impacts of the site strategically too. There must be assessments of the cumulative impact of all these sites on biodiversity and other strategic environmental issues such as hydrology. We are aware that Natural England have repeatedly asked that the development of EL1 includes a strategic approach to surface water drainage and the removal of the field directly adjacent to Marline Valley SSSI from the development footprint and yet none of these requirements are reflected in the policy wording for SIEA1.

As it stands the policy is far too broad brush and we do not believe it is compliant with the NPPF. We recommend that the policy is rewritten to include all the ecological assets and much more specific guidance on what is required in order to protect and enhance these. Development should not be allowed on designated sites.

Site reference: SIEA3 Site name: Pondswood

There should be explicit reference to the adjacent LWS, LNR and Ancient Woodland and a requirement to protect and enhance these. The redline boundary should also ensure that it does not overlap with the LWS boundary.

Summary

We hope that HDC finds our comments constructive as the draft Local Plan moves forward. We have talked extensively in our response about the need for HBC to have an up to date environmental evidence base to inform plan making from the earliest stages. As a minimum we would expect this to include:

- Up to date Green Infrastructure Strategy that identifies assets and potential for enhancements to connectivity and function
- LWS Review that influences the allocations and spatial delivery.
- More detailed Sustainability Appraisal that allows clearer conclusions and explicit reasoning for site allocations
- Consideration of the Nature Recovery Network

We do not believe the plan should go forward to the submission stage without further public consultation once this evidence base is in place.

Yours sincerely

Jess Price
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