

Dear Mr. Hollox ,

I am not persuaded that the Proposed Submission Version of the Hastings Planning Strategy demonstrates the mandatory '**Soundness**'.

For the avoidance of doubt my main concern is regarding the areas of ancient woodland and local nature reserves/wildlife which remain under threat of development.

**Pages 105/106/107 in Appendix 1: Superseded Policies** set out numerous assurances that ancient woodlands and other protected and important green spaces will be protected under the new "**superseded Policies**". My comments below seek to explain why I do not feel adequate protection is offered to these important sites.

Unfortunately, the map which illustrates proposed development sites in relation to these "protected" sites which fall under the new proposed superseded policies has not been included within this document. There is such a map (tucked away in the Appendices of a council meeting) but we are reliably informed by the planning department at HBC this map will only be presented when the **Development Management Plan** is up for consultation. Apparently it does not form part of the **Planning Strategy** document. To coin a well used phrase, it could be considered that this action is putting the cart before the horse. This map ought to have been available from the start of these consultations. One wonders why this was not the case? The map which illustrates the green spaces and protected areas was not readily available at the public consultations – it was cast to one side – it was never displayed as a conspicuous part of this consultation.

My main worry is this: How can anyone make valid observations on the Planning **Strategy** document without all the information available to us? Much of the required information is held within the Development Management Plan which is not up for discussion as yet....and presumably the Strategy part of this exercise will be done and dusted once the Hearings (February) have concluded? Strategy and Planning are inextricably linked and yet are separated by a very firm demarcation line in this instance.

It is disturbing to see that it would appear a quantity of ancient woodland has been digitally felled (in order to justify development?). It is also disquieting to note that one particular site – an especially controversial site – remains included within the development designation sites despite many years of conflict over the intention to build on this site – there are reports by Hastings own in house Borough Ecologist which set out in precise detail why no development should ever take place on this site. However – the planning department prefer to discount this report and withheld the report from subsequent planning committees, and have commissioned new surveys which set out to confirm that you can indeed build on any site subject to radical measures and the measures in this instance disregard all Natural England's Standing Advice a propos ancient woodland and wildlife, and also contradict the Nature Conservation Policies set with the councils **own** Planning Strategy document AND within the existing 2004 Local Plan.

Within the **2004 Local Plan** an assurance was issued under **Policy NC.10** that if development would involve ancient woodland, HBC would consult with the Forestry Commission. When this assurance was disregarded and subsequently queried, Simon Hubbard at HBC informed us that this reference was merely "back ground text" – however subsequent to further issues relating to this particular site including the Environmental Law

Foundation and HBCs barrister's advice, Mr. Hubbard wrote "**The Forestry Commission will be consulted in view of the presence of Ancient Woodland as indicated by the Local Plan**" - so from initially being informed that this consultation pledge was merely background text, we were later informed that it WAS indicated and relevant in the Local Plan. The new Superseded Policies EN2 and EN3 do little to assuage concerns that the ancient woodland and local nature reserves in this town are protected from development. These Policies purport to support Nature Conservation and Improvement of Biodiversity. Sad to say there is little to suggest that this is the case. One survey commissioned by HBC on this particular site reported that the strip of ancient woodland adjoining the two ancient woodlands was "effectively continuous ancient woodland" – sad to say the planning officers repudiated the expert view and said "**it is accepted that Dr. Patrick Roper states that the strip of ancient woodland between Robsack Wood and Churchwood is "effectively" continuous but effectively is not actually being continuous**".... This officer also denied that this section of woodland was ancient woodland but was subsequently proved to be incorrect – mapping inventories confirmed the ancient woodland status of this section of the woods.

We have always maintained that all maps which show designated sites in relation to these protected sites ought to have been made available at the public consultations. It is not appropriate to leave these maps until the Strategy consultations have concluded – these maps are pivotal to the entire consultation – the Strategy and The Development Plan.

On Page 106 – Nature Conservation (Old Policy NC7) there is the following pledge: ***The Green Network: Seeks to protect the Green Network from development that would sever, intrude or otherwise cause harm to its nature or purpose***..... it is clearly observed that these old Policies which sought to uphold the Nature Conservation Policies in this town, have now been cut down to Strategy Policies **EN2/3** – at least nine old NC Policies have been deleted – leaving only Policy EN2/3 to cover the vast scope of Nature Conservation issues.

We fear that this decrease in Policies will do nothing to enhance, preserve or prevent inappropriate development. There is far too much room for manoeuvre for the inappropriate management of our ancient woodlands, wildlife and nature reserves. This is a charter which leaves these valued, important areas open to exploitation and neglect.

Yours sincerely,

Mrs. Patricia Stephenson.