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The following comments are made on behalf of the Sussex Wildlife Trust in relation to the **Hasting Local Plan – Development Management Plan Revised Proposed Submission Version April 2014**.

During the examination in public hearing for Matter 4 of the Hastings Development Management Plan (HDMP) on the 20th November 2014, the Sussex Wildlife Trust were invited to clarify our views in relation to the Green Infrastructure Policy EN7 and offer a reworded policy. We were also asked to express our thoughts in relation to an ecosystem services SPD. The deadline for this submission is the 5th December 2014.

During the hearing we clearly highlighted the importance of the HDMP having a comprehensive, forward thinking green infrastructure policy and strategy. We are concerned that the suggested allocations in the HDMP compromise the natural assets and green infrastructure network of the Borough. The Sussex Wildlife Trust does recognise that the Hastings Planning Strategy adopted in February 2014 contains policy EN2 'Green Infrastructure Network'. However, we do not feel that the HDMP aligns well with the intentions of the Planning Strategy. Policy HN7 needs to be absolutely clear that any development must contribute to the overall multifunctional aspiration of the green infrastructure network of Hastings Borough, as well as delivering on site green infrastructure to ensure connectivity at a variety of levels.

Please see next page for suggested policy wording.

President: David Streeter MBE
Chairman: Chris Warne
Chief Executive: Tony Whitbread

Taking Care of Sussex

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Suggested new wording for Policy HN7 would be as follows

Development will be expected to contribute towards the provision of additional green infrastructure, address any deficits in local green infrastructure provision and protect and enhance existing green infrastructure as set out in Hastings Borough Council's Green Infrastructure Strategy. Proposals must provide a detail plan of how the development will incorporate and enhance green infrastructure on the proposed site and how that connects and contributes to the Hastings Borough green infrastructure network as a whole.

*Planning permission will only be granted where it can be demonstrated **that all the following criteria have been met:***

- A proposal maintains and enhances the green infrastructure network i.e. Local Wildlife Sites, churchyards, allotments, sports play pitches, local green space etc.*
- A proposal incorporates green infrastructure into the design of the development.*
- A proposal contributes to improving the health and wellbeing of the local and wider community*
- A proposal incorporates improvements to existing green infrastructure or the restoration, enhancement or creation of additional provision/areas.*
- A proposal incorporates improvements to existing ecology and biodiversity or the restoration, enhancement or creation of additional habitats and habitat networks appropriate to the species/habitat assemblage present in order to maximise biodiversity benefits of the locality and its setting*
- A proposal must not lead to a loss in the green infrastructure network or result in a fragmentation of the network, especially linear networks of cycleways, public rights of way, bridleways, and ecological corridors such as hedgerows, ditches and other waterways.*
- All provision will be required to be in accordance with adopted policies and strategies relating to green infrastructure and biodiversity.*

Where compensatory provision is to be made for the loss of existing green infrastructure, the provision of new and/or enhancement of green infrastructure will be required in addition to any compensatory provision. Where appropriate, the council will seek to secure via planning obligations provision for the future and/or maintenance of green infrastructure.

The Council will expect that a legal agreement is entered into, where it is necessary, to secure green infrastructure provision, or to ensure the long term sustainable management of green infrastructure. Unless stated otherwise the council will not normally be responsible for the long term maintenance or management of newly created green infrastructure.

The Green Infrastructure Strategy for Hastings Borough will be regularly reviewed and updated to incorporate newly created or enhanced assets in the network.

This revised policy clearly demonstrates the multifunctional nature of Green Infrastructure and a commitment to delivering a progressive strategy. The policy would be strengthened if Hasting Borough Council takes the time to revisit their green infrastructure strategy. We would suggest that they ensure that the green infrastructure strategy (which is integral to the evidence base for this plan) becomes a forward thinking document. This will demonstrate that Hasting Borough Council has a vision to ensure its green spaces are well connected, more resilient to the impacts of climate change and provide a resource to enhance the health, wellbeing and biodiversity of the community and the area.

Ecosystem services SPD

During the hearing we also raised the importance of committing to an Ecosystem Services SPD, so that the Council can clearly demonstrate their recognition of NPPF guidance (para 109) which calls for the planning system to '*contribute to and enhance the natural and local environment by recognising the wider benefits of ecosystem services*'.

Mr Phillips from Hastings Borough Council (HBC) did expressed concern that waiting for such a SPD would be too much to expect developers to do. We also heard from Murray Davidson (HBC Ecologist) that the Council consider themselves to be at the forefront on matters relating to biodiversity and the environment. Therefore we urge HBC to demonstrate this proactive nature within the Plan by an explicit commitment to produce an Ecosystem Services SPD to support sustainable development in the area. Mapping of ecosystem services is still an emerging process, but great advances have been made in a relatively short time. Given the suggested lifetime of the plan we would strongly urge the inspector to recommend a formal commitment to this approach in the wording of the HDMP

SNCI de-selection process

During the matter 4 hearing we also questioned the process applied to de-selecting SNCIs (Local Wildlife Sites). We were advised the answer would be given at a later hearing (matter 5), which the Sussex Wildlife Trust was not scheduled to attend. We note that the evidence base for the HDMP contains a document that is a survey reviewing the SNCI/LWS in 2009. However this purely offers recommendations for possible site de-selection. The process undertaken remains unclear to us and we would be grateful for the following information:

What is Hasting Borough Council's SNCI/LWS de-selection protocol? Can we be provided with a written copy?

When was the SNCI/LWS de-selection protocol adopted?

Can we be provided with the full minutes of the meeting detailing the date and who was present at the meeting when the SNCI/LWS which were recommended for de-selection in the report, were formal de-selected by the SNCI/LWS panel.

We feel that given the matter of the de-selection of SNCI/LWS has been a concern to us and a number of other interested parties, a clear formal response from the Council would be appropriate.

Yours sincerely

Laura Brook
Conservation Officer