

Matter 15 – Natural and Built Environment

Key Issue:

Do the policies and proposals on this matter achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy? Are they based on robust and credible evidence? Where appropriate, have alternative strategies been considered, is the identification of any sites based on a robust and rational site selection process? Are the policies and requirements clear, reasonable and justified?

a) Should Policy EN1 include more detail on the amounts of new open space required to be provided?

HBF notes that the policy refers to provision in line with the Councils Adopted Standards, however, the policy or the supporting text does not give any further guidance on what these are. The only relevant document that HBF can find on the Councils web site is the Local Planning Guidance Note no.13 Open Space Requirements which was adopted in 2006 and is described as '*informal Local Planning Guidance Notes which have been approved for development management purposes and are material considerations, but which carry less weight than the Supplementary Planning Guidance Notes.*' This document references The National Playing Field Association standard from 2001 which has now been superseded/updated.

This position leaves developers unclear on what the Council may require as part of a new development and the need to produce a new/updated SPG could result in delays in sites coming forward. The HBF suggest it would be easier to refer to the national Fields in Trust 'FIT' standard as used by many other LPA's.

f) Is it clear that the requirements of Policy EN2 relate only to the proposed development site and its immediate surroundings?

The HBF do not consider that they are and would note our previous objection to this policy.

j) Is Policy EN7 sufficiently flexible? What is meant by a 'significant' loss? Is criterion c correct and reasonable?

Regarding criterion c biodiversity covers a wider range of issues other than just trees woodland and hedgerows. It would seem more appropriate for this policy to require a net gain in trees, woodlands and hedgerows which are the landscape features covered by this policy. The wider issue of Biodiversity is a separate issue which is covered by national legislation.