

DCComments

From: conservation <swtconservation@sussexwt.org.uk>
Sent: 11 March 2022 17:18
To: DCComments
Subject: HS/FA/21/00327 - FAO Paul Howson

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Dear Mr Howson

Planning reference – HS/FA/21/00327

Thank you for consulting the Sussex Wildlife Trust (SWT) again on the above application. We have looked at the Response to Objections document (dated 10/2/22) and maintain our **objection** as set out in our letters of 24/6/21 and 17/12/21.

As stated previously, we do not believe this proposal is policy compliant and do not see that the responses set out in Table 1 of the Response to Objections document addresses this. In relation to this document:

- Under item 3, the document indicates that all the drainage infrastructure set out in Appendix B has already been built out on site. Can this be confirmed as this was not SWT's understanding. It was clear in many previous responses to multiple applications that Natural England objected to elements of the drainage scheme and therefore it was not agreed.
- We disagree with the comment that the Ancient Woodland Standing Advice requiring at least a 15m buffer is 'guidance only'. It is clear from the advice that it should be considered a material planning consideration by LPAs. Additionally, Policy EN3 of the Hastings Planning Strategy states that proposals for development should comply with national Standing Advice published by Natural England.
- SWT remains concerned that so little information is provided on how bats currently use the site, with only one survey since 2012. This is not compliant with policy. Even with only one survey since 2012, bats were recorded on the western edge of the woodland, along with an occupied bat box. We do not believe that parking spaces should be put in such close proximity to the ancient woodland and bat boxes already in use by bats.
- Whilst we acknowledge that the Environment Act was not enacted at the time the application was submitted, the requirement for development to deliver net gains in biodiversity has been a long standing feature of the National Planning Policy Framework (currently paragraphs 174 and 180). Regardless of the Environment Act, there is still a requirement under national policy to provide net gains to biodiversity. This proposal currently results in a net loss and therefore is not compliant.

Please refer to our previous objections for more detail on the above.

Yours sincerely

Jess Price



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