Appendix I20

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
20.1 Introdu	ıction
20.1	Support  1. This chapter is supported
	Objection  1. Until Memorandum of Understanding is signed with the housing market partners regarding air quality at the Epping Forest Special Area of Conservation, the Plan does not adequately address the issue of cumulative effects
	<ol> <li>An Air quality assessment is required to assess the impact on the Rye Meads SSSI</li> <li>HRA findings are disputed – reference to the Lee Valley Regional Park Development Framework HRA cannot be relied on to reflect latest Plan position; confusion as to which scenario is worst</li> </ol>
	4. Lee Valley Regional Park Authority need to be consulted regarding recreational pressure
	Conservation
20.2	Other Comments and Observations  1. As the policy considers sites the chapter should be renamed Nature Conservation Sites  2. Amendment suggested to clarify which parties provide planning advice  3. Wildlife Sites should be abbreviated LWS  4. All National Nature Reserves are SSSIs
20.2.2	Support  1. This statement is supported, particularly reference to Local Nature Partnerships

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)	
20.2.8	Support  1. This statement is supported	
20.2.9	Support  1. This statement is endorsed	
	Objection  1. Should be more distinction between sites of different importance  2. Requires rewording to be in line with the NPPF	
20.2.10	Support  1. This statement is endorsed	
	<ol> <li>Object</li> <li>The NPPF does not require net gains to biodiversity only where possible. Amendment required otherwise policy assumes refusal if net gain is not provided</li> <li>No guidance that says offsetting is required for all developments with a negative impact</li> <li>Questions whether the calculator captures full ecosystem services</li> </ol>	
	Other Comments and Observations  1. Amendment suggested to refer to a locally approved DEFRA biodiversity metric rather than biodiversity Impact Assessment Calculator	
20.2.11	Support This statement is endorsed	
Policy NE1 International, National and Locally Designated Nature Conservation Sites		
NE1	Support  1. This policy is excellent in principle	

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	2. This policy is supported
	<ol> <li>Objection         <ol> <li>Adds no additional value to the NPPF policy</li> <li>Should be more distinction between sites of different importance – international sites afforded greater protection</li> <li>Reference required to geodiversity and priority habitat</li> <li>Requires reference to protection and enhancement of soils</li> <li>Requires reference to protecting Best and Most Versatile Agricultural Land</li> </ol> </li> <li>Other Comments and Observations         <ol> <li>Amendment suggested to refer to a locally approved DEFRA biodiversity metric rather than biodiversity Impact Assessment Calculator</li> </ol> </li> </ol>
NE1	<u>Objection</u>
Part II	Policy is incorrect to use two tests. If site is protected under the Habitats Directive there are three tests
Policy NE2	Sites of Nature Conservation Interest (Non-Designated)
NE2	Support  1. This policy is supported
	<ul> <li>Objection</li> <li>1. Adds no additional value to the NPPF policy</li> <li>2. Query effectiveness of policy in ensuring no reduction in the environmental benefits of green corridors</li> </ul>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)		
	Other Comments and Observations  1. Amendment suggested to refer to a locally approved DEFRA biodiversity metric rather than biodiversity Impact Assessment Calculator		
20.3 Specie	20.3 Species and Habitats		
20.3	Support  1. The integration of biodiversity into the Plan is supported – a good example to follow		
	Objection  1. Concern over impact of urban extensions on known badger setts		
	Other Comments and Observations  1. A safeguarded area of 13km radius needs to remain around Stansted Airport to prevent birdstrike risks		
20.3.3	Support  1. This statement is excellent		
	Other Comments and Observations  1. Amendment suggested to refer to a locally approved DEFRA biodiversity metric rather than biodiversity Impact Assessment Calculator		
20.3.6	Support  1. This statement is endorsed		
	Other Comments and Observations  1. Rye Street allotments should be retained – bee species		

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
20.3.13	Other Comments and Observations  1. Description of culverting may need further explanation – restoring the habitat i.e. de-culverting
Policy NE3	Species and Habitats
NE3	Support  1. This statement is excellent and is strongly supported
	Objection  1. Adds no additional value to the NPPF policy
NE3 Part I	Other Comments and Observations  1. Amendment suggested to refer to a locally approved DEFRA biodiversity metric rather than biodiversity Impact Assessment Calculator
NE3 Part V and VI	Objection  1. Parts V and VI will frustrate and potentially sterilise potential development – example includes Skylarks at northern part of Bishop's Stortford South site
NE3 Part VII	Objection  1. 10 metre buffer requirement is excessive and conflicts with WAT3 which requires an 8 metre buffer alongside main rivers – amendment suggested
Policy NE4 Green Infrastructure	
NE4	Support  1. This policy is strongly supported

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<u>Objection</u>
	Adds no additional value to the NPPF policy
	2. Query effectiveness of policy in ensuring no reduction in the environmental benefits of green corridors and meeting demands of fishing
	3. Plan does not consider the implications of Stewardship schemes coming to an end
	4. Does not consider the Right of Way Improvement Plan
	5. Policy should require compensation, offsetting, creation of new corridors and measures to
	identify and protect species rich habitats and habitats of local importance
	6. Policy is too generic and meaningless
	7. The Welwyn Hatfield Green Corridor should be mentioned