

## **HBF comments in response to invitation from the inspectors to comment on policy ST50.**

Thank you for the email, and for the opportunity to contribute to the Hearing Sessions discussion even though I can't be there in person. My comments are provided below, due to the short timescales involved I have not had chance to take comments from the members of the HBF and this may mean that further issues are raised at the formal modifications stage.

The Council have shared with the HBF their proposed response to the Inspectors Action 70. However, the HBF remains concerned in relation to the proposed modification to Policy ST50 which requires major development to make provision for 5 trees per dwellings.

The HBF is still not clear how the Council arrived at the requirement for 5 trees per dwelling, or how assumptions were made in relation to the size and standard of trees. The HBF considers that the provision of 5 trees per dwellings has potential to have a significant impact on the land uptake for any development and may have significant implications for the density of developments, this in itself has potential to have a significant impact on the viability of developments. The provision of five trees per dwelling may also have implications in relation to highway provision and highway maintenance and again may need to be given further consideration by the Council and the developers of these sites.

The HBF also has concerns that the Council are suggesting the use of small saplings with a low purchase cost, whilst the HBF appreciate this could be beneficial in terms of the cost of the policy, it is likely to have implications in terms of the maintenance of the plant, and may lead to a significant number of the saplings not making it to mature trees, it may also mean that all of the trees have a similar life span, which may also not be beneficial to have across one site. The HBF are also not clear whether the Council are looking for these trees to be provided in public or private parts of the site, which again could have implications in relation to the management and maintenance of these trees going forward. The HBF considers that all of these elements will need to be considered in terms of the deliverability and viability of development.

The HBF notes that the policy states that if on site provision is not practicable than an equivalent financial contribution will be sought to enable provision of new native trees and/or the protection and enhancement of ancient and veteran woodland within the District. There is limited information provided in relation to how it will be determined if on site provision is not practicable, or how the financial contribution would be calculated or why greater flexibility is acceptable in terms of how the financial contribution is spent but isn't provided in the policy. Without this information it is very difficult to comment as to whether this would be an acceptable approach.

The HBF understands the Councils desire to contribute to carbon neutrality, but would question whether the tree policy proposed is the best way to do this, and whether other options or ranges of options may be more appropriate. The HBF continues to recommend that this policy is deleted. And that if the Council wishes to encourage or promote contributions towards carbon neutrality, that the policy states that instead. And that the policy could suggest that this could be done through provision of trees on or off-site or through alternate methods or approaches, taking into account other policy requirements and site circumstances.

HBF

20 January 2023